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ABSTRACT

Using new information from the 1980 census and data from a special study of Indian Student Certification Forms in 1982, this revised report was submitted in lieu of the initial 1982 Report to Congress on the Definition of Indian. The report presents estimates which respond to the following points in the statutory mandate: number of Indian children eligible and served under part A of the Indian Education Act; consequences of eliminating descendants in the second degree; and options for changes in the definition and their consequences. The report reaches two major conclusions concerning the relation of definitions to counts of Indian children: the term Indian has no singular meaning and efforts to stabilize Indian counts by means of added precision in the questions relied on for identifying Indian children are likely to have just the opposite effect. The appendices provide an analysis of defects in the estimates contained in the 1981 Report on the Definition of Indian; a description of the special study of the Indian Certification (506) Forms; an evaluation of the 1980 census data on Indians; and 10 detailed State tables pertaining to Indian children enrollment. (ERB)

REVISED REPORT O N DEFINITION INDIAN



A STUDY OF ALTERNATIVE DEFINITIONS AND MEASURES RELATING TO ELIGIBILITY AND SERVICE UNDER PART A OF THE INDIAN EDUCATION ACT

> A REPORT FROM THE SECRETARY OF EDUCATION TO THE PRESIDENT AND THE CONGRESS

> > SEPTEMBER 30, 1982

U. S. DEPARTMENT OF EDUCATION

T. H. Bell, Secretary

U.S. DEPARTMENT OF EDUCATION

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EXECUTIVE SUMMARY

On September 24, 1981, the Department of Education submitted an initial report to the Congress on the Definition of Indian. This report contained comprehensive information on Federal and State-recognized tribes, as well as valuable expressions of the views of members of Indian communities. However, for reasons set forth in Appendix A, the estimates of Indian children in this earlier report could not be endorsed. Accordingly, further work was undertaken which has resulted in the present report.

Using new information from the 1980 Census, plus data obtained this year from a special study of Indian Student Certification Forms on file in local education agencies participating in the Part A Indian Education Program, the Revised Report presents estimates which respond to the following points in the statutory mandate:

- o number of Indian children eligible and served under Part A of the Indian Education Act;
- o consequences of eliminating descendants in the second degree; and
- o other options for changes in the definition and their consequences.

While the estimates presented in this report are based on sound methods and the best available data, their accuracy is nonetheless open to question. The reason for this is that there exists no single standard for judging the true number of Indians. Evidence on this point constitutes one of the major findings of our study. On the apparently simple question of the number of Indian children ages 5 to 17, our analysis of the Census data indicates the following:

- o More than half the increase between 1970 and 1980 in the number of school-age Indian children is attributable to changes in reporting of race from non-Indian to Indian for individuals ages 0 to 7 in 1970 and 10-1% in 1980. (Table 1 of Appendix C)
- o For 23 States, the 1980 sample estimate of Indian race children exceeds the corresponding complete-count figure by 10 percent or more. We conclude from this that the Census race question more often elicited an "American Indian" response when it was one of the fore than 50 questions on the sample questionnaire than when it was one of just 7 questions on the short-form questionnaire. (Table 10 of Appendix D)
- o Substantial numbers of school-age children are reported to be only of Indian ancestry (i.e., with no second, non-Indian ancestry indicated), but not of the Indian race. In 11 States, the number of such children was more than twice the number of Indian race children. (Table 10 of Appendix D)

o The behavior of State-level census statistics for Indian children in the last two respects just noted is significantly related to:
(1) the proportion that Indian race children represent of all school-age children in the State, (2) the percent of Indian race children for whom a tribal affiliation was reported, and (3) the percent of Indian children from homes where an Indian language is regularly spoken. (Table 4 of Appendix C)

Based on this and other evidence presented, the report reaches the following conclusions concerning the relation of definitions to counts of Indian children:

- o The term Indian has no singular meaning. Counts obtained in response to the same question vary significantly over time, in response to the context in which the question is asked, and as a function of the social characteristics of local Indian populations.
- o Efforts to stabilize Indian counts by means of added precision in the questions relied on for identifying Indian children are likely to have just the opposite effect, because complex questions produce confusion, with the result that responses become even less predictable.

Concerning the impact of these problems of instability in counts of Indian children on the Part A Program, the report presents two findings that offer some reassurance: between 1976 and 1980, growth in Part A participation was greatest in those States where Indian counts are most stable, and as of 1980, these same States as a group had the highest participation rates (Tables 2-6 and 3-3). Other evidence shows that the educational disadvantagement of Indian children (as measured by poverty rates, school dropout rates, and use of an Indian language) is less severe in States characterized by lower Part A participation rates and less stable counts of Indian children (Table 5-1).

The report contains no proposals involving the Secretary of Education's exercise of his discretionary authority under clause (4) of the statutory definition of Indian (Section 453(a) of Public Law 92-318, as amended; 20 U.S.C. 1221h), and no recommendations concerning changes in that definition. However, as noted in the report (page 13), the Secretary is committed to making recommendations to the Congress concerning possible changes in the statutory definition of Indian before the end of this calendar year (1982), and timely public comment on this report is therefore being solicited.

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CHAPTER I: PURPOSE, BACKGROUND, AND SCOPE OF THE STUDY

A. The Legislative Mandate

Section 1147 of the Education Amendments of 1978 (P.L. 95-561) added the following as subsection (b) to Section 453 of the Indian Education Act (Title IV of P.L. 92-318):

"...The Assistant Secretary of Health, Education, and Welfare for Education, in consultation with Indian tribes, national Indian organizations, and the Secretary of the Interior, shall supervise a thorough study and analysis of the definition of Indian contained in subsection (a) and submit a report on the results of such study and analysis to Congress not later than January 1, 1980. Such study and analysis shall include, but not be limited to—

- (1) an identification of the total number of Indian children being served under this title;
- (2) an identification of the number of Indian children eligible and served under each of the four clauses of such definition in such subsection;
- (3) an evaluation of the consequences of eliminating descendants in the second degree from the terms of such definition, or of specifying a final date by which tribes, bands, and groups must be recognized, or of both;
- (4) other options for changes in the terms of such definition and an evaluation of the consequences of such changes, together with supporting data;
- (5) recommendations with respect to criteria for use by the Commissioner under the rulemaking authority contained in clause (4) of such subsection."

On September 24, 1981, the Department of Education submitted to the Congress an initial report on the Indian Definition Study containing valuable expressions of views obtained from members of Indian communities at fourteen public hearings, as well as written testimony, statements of official positions from Indian organizations, and information on federally recognized and non-federally recognized tribes. In his transmittal letter, however, Secretary Bell indicated that the Department of Education was unable to

endorse the report's estimates, and was, accordingly, undertaking further analysis based on more accurate information. This report contains the results of the Department's further analysis, and its estimates and conclusions should be regarded as supplanting those of the previously submitted report.

B. Background of the Legislative Mandate

The history of the Indian Education program, culminating in a mandate for a study of the definition of Indian, covers a span of just ten years. In this period, the attention of Congress and the nation was focused on the unmet needs of Indian children, a new program was created to comprehensively address those needs, the program came under critical review (and restrictive changes were proposed), and finally a legislative compromise was reached which left the scope of the program unchanged but called for further study and recommendations. Each of these phases of the program's history is described below.

Documentation of unmet needs

In 1968, in response to widespread concern among Indians and others about the conditions of Indian education in the United States, the Senate Committee on Labor and Public Welfare formed the Subcommittee on Indian Education with Senator Robert F. Kennedy as chairman, to study all aspects of Indian education in the United States. Following an extensive series of hearings around the country, visits to Federal and local public schools serving Indian children, review of testimony from Indian organizations and interested State and Federal agencies, and an examination

of all available data, the Subcommittee issued a report, entitled: Indian Education: A National Tragedy - A National Challenge, (1969).

In this report, the Subcommittee declared that the national policies for education of American Indians were "a failure of major proportions," and documented high dropout rates and low achievement among Indian students, inadequate levels of expenditure for their books and other instructional materials, and a serious lack of attention to the social and emotional needs of Indian students in the public schools. "While Indian education is receiving some financial assistance through Public Law 81-874," the report said, "it is hardly enough to provide students with an equal educational opportunity." The report also presented a long list of recommendations for legislative and administrative action to restructure and reform Indian education. Among these was a recommendation that "There be presented to the Congress a comprehensive Indian education act to meet the special education needs of Indians both in the Federal schools and in the public schools." 2

Adoption of a broad approach to service

In response to this recommendation, an Indian Education bill was introduced in the Senate on September 23, 1970 (S. 4388). This bill authorized grants to local education agencies (LEAs) for a broad range of projects designed to improve educational services to any child "who is an enrolled member of a tribe, band, or other organized group of Indians, or who is a descendant of any such member." On February 25, 1971, the proposed

Senate Report No. 91-501, p. 54, quoted in the Congressional Record, U.S. Senate, November 12, 1969, p. 33858.

Senate Report No. 91-501, p. 110, quoted in the Congressional Record, U.S. Senate, February 25, 1971, p. 3945.

act was amended to become a part of S. 659, the Higher Education Act of 1971, with only a few changes. The definition of Indian was expanded to include "any individual who is an enrolled member of a tribe, band, or other organized group of Indians, or who is a descendant of any such nember or who is considered by the Secretary of the Interior to be an Indian."

When S. 659 was reported by the Senate Committee on Labor and Public Welfare on August 3, 1971, the definition had once again been changed.

The term "Indian" for the purposes of the Indian Education Act now read:

Any individual who (1) is an enrolled member of a tribe, band, or other organized group of Indians, including those tribes, bands, or groups terminated since 1940 and those recognized now or in the future by the State in which they reside, or who is a descendant, in the first or second degree, of any such member, or (2) is considered by the Secretary of the Interior to be an Indian for any purpose, or (3) is an Eskimo or Aleut or other Alaska Native, or (4) is determined to be an Indian under regulations promulgated by the Commissioner, after consultation with the National Advisory Council on Indian Education, which regulations shall further define the term "Indian."

The intent was to be inclusive rather than exclusive in the definition of eligible children, a point further emphasized in the Committee's report:

"One general principle which applies to the range of Indian education amendments in this bill is that programs are addressed to all Indians, Eskimos, and Aleuts in this country. These provisions recognize that as to urban Indians, terminated tribes, and other non-federal Indians, there exists a responsibility on the part of the Federal government—at minimum, remedial in nature—to provide educational assistance. Both the termination policies of the 1950s and the continuing relocation programs have intensified the impoverishment and educational deprivation of many of the so-called non-federal Indians. Thus, the grant and entitlement provisions of this bill, by applying to all Indians, are directed in part at remedying the consequences of past Federal policies and programs."

Feducation Amendments of 1971 Report of the Committee on Labor and Public Welfare on S. 659, Senate Report No. 92-346, August 3, 1971, p. 253.

⁴ Education Amendments of 1971, Report of the Committee on Labor and Public Welfare on S. 659, Senate Report No. 92-346, August 3, 1971, p. 94.

After minor amendments designed to further amplify this comprehensive approach, the Act was signed into law on June 23, as Title IV of the Education Amendments of 1972 (P.L. 92-318).

Review and criticism

The new program was vulnerable to criticism on two points. First, while the amount of an LEA's grant was to be based on the total number of Indian students enrolled, the LEA was under no obligation to ensure that all those students benefited. Second, with virtually no guidelines for counting eligible children, LEA's sometimes reported numbers that were inconsistent or highly questionable.

Both of these points figured prominently in a GAO report submitted to the Congress on March 14, 1977. One of the examples provided in the report described six LEAs with Indian enrollments totaling 11,700, where only 4,700 (40 percent) of these children were in schools actually served by projects addressing the education of Indian children (Part A of the Indian Education Act). Among the six LEAs, the proportion of children available to be served ranged from 12 to 67 percent. The GAO team also found three cases (out of twelve reviewed) where the reported figure for Indian enrollment more than doubled in a single year, resulting in proportionate increases in the size of their Part A grants. Commenting on these findings, the House Education and Labor Committee report on H.R. 15 stated:

At present, the definition of "Indian" is so broad that the Committee has seen the abuse in the counting of children who are eligible to participate under the program and the inability of program people in the Office of Education to effectively monitor the participation in this program or evaluate its results.

⁵ House Report No. 95-1137, p. 126.

The Committee recommended tightening the definition by eliminating descendants in the second degree.

Compromise and further study

On July 13, 1978, Congressman Quie of Minnesota successfully sponsored an amendment on the House floor which deleted the Committee's proposed exclusion of second-degree descendants, and left the definition as enacted in 1972. In lieu of the Committee's change, Quie's amendment resulted in three new sections in P.L. 95-561: (1) Section 1147 mandating a study of the definition of Indian to be conducted by the Assistant Secretary of Education; (2) Section 1148, establishing requirements regarding the kinds of data to be collected in verifying a child's eligibility under Part A; and (3) a new Section 1149 establishing a method of monitoring Part A projects (rolling audits).6

C. The Previously Submitted Report

The study mandated by Section 1147 was forwarded to Congress on September 24, 1981, but in his transmittal letter Secretary Bell stated that the Department of Education could not endorse the report as presenting an "accurate or complete description of the size of Indian groups." The reasons given for this lack of confidence in the report's estimates included reliance on "faulty information," "weak or even incorrect" methodology, and conflicting evidence which had just become available from the 1980 Census. In concluding, the Secretary indicated that steps would be taken to correct the report's inadequacies and that a further report would be submitted in about one year's time.

⁶ Congressional Record, House, July 13, 1978, pp. H6660-H6662.

A detailed analysis of errors affecting the estimates of the previous report is presented in Appendix A. The consequences of those errors, relative to the report's findings on major points of interest to the Congress, will also be noted in relevant sections of the next three chapters. Here we limit ourselves to a brief description of three major problems affecting the earlier report's estimates, indicating in each case, the new sources of information which we rely on for making the necessary corrections.

Inflated projections of school-age Indian children

In the absence of information from the 1980 Census, the previous report depended on projections for 1980, based on data from the 1970 Census, information on births, and certain assumptions about shifts in racial identification. Demographic analysis suggested that the projected figure of 495,600 Indian children (ages 5-17) was impossibly high, and this was confirmed by early results from the 1980 Census which indicated a total count of 405,800 for this group. Accordingly, the Department arranged to have the Bureau of the Census produce a set of special tabulations for schoolage Indians, and it is on these results that our estimates rely.

Incomplete sampling universe

To estimate the number of Indian enrollments in public school districts not participating in the Part A program, the previous report relied on a special sample of districts represented in an Office of Indian Education file. This "Part A" file contained information on about 2,500 non-Part A districts with Indian enrollments, but subsequent comparisons with the 1976 Office of Civil Rights Directory of Public Elementary and Secondary School Districts indicate that the actual number of such districts is close to 5,900. In this report, we religion the 1976 OCR Directory for

information on Indian enrollments in unserved districts, and as a result, our estimates are higher by about 32,500.

Defective questions dealing with first- and second-degree descent

Although the Part A districts surveyed by the previous study were a valid sample (since all such districts were included in the Part A file), the questions dealing with numbers of children (1) "considered Indians only by virtue of their natural parents" (and (2) grandparents) were logically defective. Specifically, districts were asked to account for all their Indian enrollments under these two headings (plus a residual category for adoptions, foster children, etc.), where they should have been asked to account for only children who were not members of a tribe in their own right. Apparently most districts in the sample complied with this illogical requirement, because tabulations of the sample returns (contained in Appendix A of the previous report) indicate that first— and second—degree descendants account for 99 percent of the total Indian enrollments in Part A districts.

To obtain valid estimates of second-degree descendants—specifically called for in the study mandate—the Department decided to collect new evidence. Accordingly, individual student certification forms ("506" forms) on file in a national sample of 116 Part A districts were examined in the spring of 1982 and their contents systematically recorded. A full description of the sample and methodology involved in this work is contained in Appendix B. The main findings are presented in Chapter II, and these findings are further assessed for their implications in the concluding section of Chapter IV.

D. Limitations of the Present Study

Specific limitations of the present study are discussed below, under headings taken from the language of the legislative mandate quoted in full on page 1.

"Identification...of Indian children served under this Title."

The Indian Education Act authorizes three basic programs—Part A

Grants to Local Education Agencies and Indian—Controlled Schools,

Part B Special Projects for Indian Students, and Part C Special Projects

for Indian Adults. Indian children may receive services under Parts

A and B, but the present study focuses exclusively on participation

in Part A, since this program accounts for the greatest portion of

services provided to Indian children.

"Number of Indian children eligible and served..."

Three progressively restricted meanings of "eligible" may be distinguished:

- (1) children who qualify as Indian under the statutory definition,
- (2) only such children as are enrolled in LEAs or Indian-controlled schools eligible for Part A Grants (generally interpreted as excluding Indian children enrolled in LEAs having fewer than 10 Indian students, as well as those enrolled in privately controlled schools), and
- (3) Indian children enrolled in LEAs or Indian-controlled schools participating in the Part A program.

Following the example of the previous report, the present study undertakes to estimate numbers of eligible children under all three interpretations—that is, school—age Indian children, Indian children in LEAs eligible for Part A grants, and

Indian children in LEAs actually receiving Part A grants. Here it should be noted that estimates of the last group have sometimes been described as "served."

A stricter interpretation of "served," however, would refer to Indian children who actually receive services or other benefits from activities supported by Part A funds within the local school district. Field visits and reports suggest that this is a meaningful distinction, especially in large districts. While Part A grant allotments are based on a district's total Indian enrollment, actual services may be provided only in schools with significant concentrations of Indian students. Thus, some eligible students in districts receiving Part A funds may go unserved.

Unfortunately, this report has no new information to offer on the subject of the numbers or proportions of Indian students actually served within Part A districts as these data are not uniformly collected or reported. In an analysis presented later, we will display the quantitative implications of the previous study's finding on this point, but we continue to have very serious misgivings about the special survey (discussed in Appendix A) which produced this estimate.

"Eligible and served under each of the four clauses" (of the definition)

The four clauses referred to here appear in the statutory definition,
as follows:

"Section 453(a). For purposes of this title, the term "Indian" means any individual who (1) is a member of a tribe, band, or other organized group of Indians, including those tribes, bands,

or groups terminated since 1940 and those recognized by the State in which they reside, or who is a descendant, in the first or second degree, of any such member, or (2) is considered by the Secretary of the Interior to be an Indian for any purpose, or (3) is an Eskimo or Aleut or other Alaska Native, or (4) is determined to be an Indian under regulations promulgated by the Commissioner, after consultation with the National Advisory Council on Indian Education, which regulations shall further define the term "Indian."

Since criteria employed by the Secretary of the Interior are considerably more restrictive than clauses 1 and 3, and since the U.S. Commissioner of Education never issued regulations further defining the term "Indian," only two clauses apply, and as a practical matter, this amounts to distinguishing between Eskimos, Aleuts, or other Alaska natives, on the one hand, and all other children qualifying under the first clause, on the other. Using data from the "506" Indian Certification Forms on file in a sample of Part A districts in the Spring of 1982, we are able to estimate the size of both groups of eligible children in the Part A universe. Using the 1980 Census data on race and school enrollment, we can present estimates of both groups in public schools outside the Part A universe. Unfortunately, no information is available on the numbers or proportions of children in these two groups who actually received services.

"Consequences of eliminating descendants in the second degree"

Here again, our estimates rely on the sample of 506 forms just mentioned,
so our examination of consequences is limited to a consideration of

⁷ Public Law 92-318, as amended; 20 U.S.C. 1221h.

the relative numbers of such children, and characteristics of Part A districts which would be most affected by such a change in the statutory definition.

"Other options for changes...and their consequences"

By making extensive use of the 1980 Census data on Indians, and comparing estimates from this source with school reports (made to the Department's Office for Civil Rights) and to figures based on Part A applications, we provide a basis for evaluating the consequences of a definition which gives official standing to parental representations concerning the race of the child, since this essentially, is the operational definition of "Indian" employed by the Census. Specifically, a child is of the Indian race if the household informant completing the Census form so represents the child, and one of the parents is generally the household informant.

"Recommendations with respect to (new) criteria for use by the Commissioner as noted above, clause (4) of the statutory definition authorized the Commissioner of Education to promulgate regulations further defining the term "Indian" and, by implication, to extend recognition as Indians to groups not qualifying under the first three clauses. The 1978 Education Amendments directed the Assistant Secretary for Education (of the then Department of Health, Education, and Welfare) to conduct a study of the definition of Indian, and up to that time, the Commissioner had made no use of the discretionary authority contained in clause (4). Accordingly, it seemed appropriate to the Congress to ask the

respect to the Commissioner's exercise of this authority. However, under the reorganization act which created the Department of Education, the Secretary of Education acquired the rights and obligations of both officers, and thus is under the obligation of making recommendations concerning his exercise of the discretionary authority originally given togethe Commissioner.

The present report contains no proposals involving the Secretary's exercise of his discretionary authority under clause (4), and no recommendations concerning changes in the existing statutory definition. On the latter point, however, it should be noted that the Secretary is committed to making recommendations to the Congress concerning possible changes in the statutory definition of Indian before the end of this calendar year (1982). Prior to making these recommendations, public comment on the present report will be solicited and carefully weighed. Thus, the present report is limited to an examination of current evidence bearing on eligibility and service under Part A of the Indian Education Act, based on alternative measures and definitions.

In his letter of February 12, 1982, to the Chairmen of the House and Senate Committees on Appropriations, Secretary Bell described plans to obtain new data from the 1980 Census and a special study of "506" certification forms. He then went on to state: "Data from these sources will become available for analysis between March and August. Accordingly, we are confident of being able to present revised estimates to the Congress this fall. My recommendations concerning any needed changes or alternatives in the current definition will be submitted before the end of the year."

CHAPTER II: PATTERNS OF PARTICIPATION IN THE PART A PROGRAM

A. National Trends in Participation

Table 2-1 presents the numbers of Part A students and grants for each year since 1976. Our examination commences with this year for two reasons: first, 1976 was the last year of steady growth in the Part A student counts, and second, detailed information on earlier years is not available in computer-readable form for analysis.

Since 1976, there have been four reversals in the numbers of Part A students and grants. As Table 2-1 indicates, however, year-to-year changes in the student and grant counts have been relatively modest.

Overall, the seven-year period depicted here can be summarized in a single statement: roughly 1,100 grants were made each year to districts reporting around 300,000 Indian enrollments.

TABLE 2-1. Total Part A Indian Students and Numbers of Grants, 1976 to 1982, with Analysis of Year-to-Year Changes

			■	* *		
 ,	Number of	Indian Students	Part A Grants			
		Change from		Percent	Percent	
Year		Previous	Total	New This	Not	
	Total	Year	Number	Year	Renewed	
1976	302,100	+ 13.1%	1,062		16.3	
1977	*	- 1.7%	1,013	12.3	9.6	
1978		+ 9.4%	1,086	15.6	7.4	
1979		+ 3.9%	1,139	11.7	9.7	
1980		- 2.7%	1,135	9.4	10.2	
1981		- 8.8%	1,053	3.8	1.7	
1982	μ*	+ 6.6%	1,112	6.3		

SOURCE: Special tabulation of the Part A Program Files for 1976-1980 and 1978-1982.

Underlying the relatively stable number of grants there has been a good deal of movement in and out of the program on the part of individual school districts. Specifically, in each of the four years, 1977 through 1980, more than a fifth of the participating districts were commencing or ending their participation in that year (i.e., did not participate in the previous or; following year). This means that much of the change in total Indian student counts may be the net result of losses associated with districts not continuing in the program and gains associated with new districts entering the program. Table 2-2 confirms this speculation for changes observed over the period 1976 to 1980.

TABLE 2-2: Changes in Part A Participation of LEAs, 1976 to 1980: Total United States

Number of LEAs by	Indian Student Counts			
Participation Status in/1976 and 1980	1976	1980	1976 to 1980\ Net Change	
859 LEAs in both years 203 in 1976 but not 1980 276 in 1980 but not 1976	20,200 -	279,400 42,600	+ 4,600 -20,200 +42,600	
TOTALS	, 295,000*	322,000*	+27,000	

^{*} These totals are lower than those shown in Table 2-1 because of the exclusion of enrollments in tribal schools receiving grants in 1976 and 1980.

SOURCE: Part A Program File for 1976-1980.

Increases in student counts of LEAs participating in both 1976 and 1980 amounted to less than 2 percent over the four-year period. Thus, of the total increase of 27,000 observed over this period, 22,400 (83 percent) is attributable to the difference between the claims of new districts and those of districts not continuing in the program. This is reassuring

evidence from the standpoint of the types of apparent abuses noted in the 1977 GAO report, where it was observed that the claims of several districts more than doubled in a single year. At the same time, however, these findings are suggestive of less continuity in the delivery of Part A services than might be desired. In this connection, we need to remind ourselves that the experience of individual States is "averaged out" in national summaries. Thus, there is a question of whether the turnover indicated in Table 2-2 might be concentrated in just a few areas, with correspondingly more serious implications for lack of continuity in service. It is to explore this and similar questions that we turn next to an examination of participation trends at the State level.

B. State-Level Participation Trends

Part A grants go to LEAs in 41 States, but 90 percent of the Indian students counted for participation are in the 15 States with the largest Indian populations. Accordingly, most of our analysis is focused on these 15 States. Readers interested in reviewing data for the other States should consult the tables in Appendix D. The Appendix tables also provide more precise figures, as text tables present data only to the nearest 100 % (i.e., in thousands, with one decimal place).

Table 2-3 shows the distribution of Part A Indian counts in 1976 and in 1980 for the 15 selected States, and also indicates how changes in LEA participation contributed to the total change in Indian students.

Report to the Congress by the Comptroller General of the United States.

Indian Education in the Public School System Needs More Direction from the Congress, HRD-76-172, March 14, 1977.

For example, Arizona reported a gain of 8,600 students between 1976 and 1980 (32,800-24,200). Indian students in new districts (column 3) exceeded those in "dropout" districts (column 2) by 6,900 (7,400-500) so the balance of the total gain (1,700 or 8,600-6,900) is attributable to increases in the claims of districts participating in the program in both years.

TABLE 2-3: Indian Student Counts of Part A LEAs in 1976 and 1980, with Separate Estimates for "Dropout" and "New" Districts

		imates	in Thous	ands
	Total	1976 But	1980 But .	Total
Selected State	1976	Not 1980	Not 1976	1980 ~
	(1)	(2)	(3)	(4)
Alaska	17.2	- 1 7		
Arizona	24.2	1.7	.3	18.0
California		.5	7.4	32.8
Michigan '	36.3	4.0	5.5	37.2
Michigan	19.4	2.4	2.4	18.0
Minnesota	11.9	• 3	. •0	10.2
Montana	8.3	•4	1.6	9.3
New Mexico	23.5	• .1	1.8	24.1
New York	5.7	.1	0	5.0
North Carolina	12.7	.1	1.4	
Oklahoma	65.6	4.7		16.1
Oregon	3.9	7.0	16.4	79.5
South Dakota	8.9		1.1	5.5
Texas		•4	1.8	10.2
Washington	1.2	.3	• 1	1.2
Washington	18.3	1.3	.9 ,	17.3
Wisconsin	7.0	.1	.8	6.2
Subtotal	264.0	16.4	41.3	290.6
*All Others	31.0	3.8	1.3	31.4
f Mamile	295.0	20.2	42.6	322.0

^{*} Note that only 41 States participate in the Part A program. Thus, "all others" includes only the remaining 26 States.

SOURCE: Office of Indian Education Part A Program File, 1976-1980.

A wide range of descriptive concerns can be addressed by means of the data in Table 2-3. Here, we confine our discussion to a few examples:

- o Major Part A States. Oklahoma, California, and Arizona reported the largest numbers of Indian students in both years.
- o Major gainers. Oklahoma again leads the list, followed by Arizona.
- O States showing lower counts in 1980. This applies to Michigan, Minnesota, New York, and Wisconsin.
- Top fifteen States versus "All Others". The 26 States in the "all other" category together accounted for only a little over 10 percent of all Part A Indian students in both years. Their share of the total increase was below average (1.5 percent) while their share of students in districts not continuing to 1980 was above average (3,800 out of 20,200 or about 19. percent).
- o Sources of growth in individual States. Of the 13,900 increase registered by districts in Oklahoma, 11,700 is attributable to the excess of Indian students in new districts over those in "dropout" districts. The remainder of 2,200 reflects increased claims of districts participating in both years.

We turn next to an examination of changes in the number of Part A grants which produced the Indian student counts displayed in Table 2-3. Here again, we see in Table 2-4 that underlying the relatively stable counts of Indian students is a good deal of movement in and out of the program on the part of individual districts. For example, looking just at the number of grants to LEAs in California for 1976 and 1980 (columns 1 and 4), one could not guess that over this period 39 districts dropped out or did not have their grants renewed while 35 new districts came into the program.

As a group, the 15 major States exhibit, more stability than those combined on the "all others" line, with a four-year retention rate of 82 percent compared to 74 percent for the other 26 States. Among the 15, however, Texas and Michigan stand out with retention rates of only 50 and 68 percent, respectively. It is also noteworthy that just three States—California, Michigan, and Oklahoma—account for more than half of the "dropouts" and additions since 1976.

TABLE 2-4: Number of Part A Grants in 1976 and 1980, With "Dropout" and New Districts Shown Separately

Selected States	Total 1976 (1)	1976 But Not 1980 (2)	1980 But Not 1976 (3)	Total .1980 (4)	Proportion of 1976 LEAs in 1980 Program (5)
Alaska	46	5	3	44	. 89
Arizona	40	·2	22	60	.95
California:	159	39	35	155	.75
Michigan	121	39	25	107	.68
Minnesota	61	10	- 5	56	.84
Montana	39	4	14	49	.90
New Mexico	20	.3	6	23	.85
New York	16	1	0	15	.94
North Carolina	20	1	4	23	.9 5
Oklahoma	219	33	91	277	85
Oregon	22	3	11	30	.86
South Dakota	30	7	11.	. 34	. 77 ,
Texás	8	4	1 -/-	5	.50
Washington	. 69	8	13	74	.88
Wisconsin	35	3	6	38	.91
Subtotal	905	162	247	990	.82
All Others	157	41	29	145	74
TOTAL, U.S	1,062	ె 203	276	1,135	.81

SOURCE: Office of Indian Education Part A Program File, 1976-1980.

C. Groups of States with Similar Characteristics

In searching for significant patterns related to participation in the Part A program, the ideal situation would be to have data on the social and economic characteristics of every local district. This would make it possible to examine participation rates within classes of LEAs, defined in terms of the variables of particular interest. To a very limited extent the 1976 Office for Civil Rights Survey of Public Elementary and Secondary School Districts permits this type of analysis, and we will draw on this survey in examining the relationship to participation of two factors district size (total enrollments) and the ratio of Indian students to total enrollments in the district. For the most part, however, we are limited at present to State-level data, and even when the list of States being examined has been reduced to 15, it is sometimes difficult to discern patterns. For this reason, we are going to define five groups of States that exhibit some marked differences on characteristics of special interest to our study.

We have already defined three groups of States: the 15 with the largest Indian populations, another 26 with at least one Part A grant recipient, and the remaining 9 States, plus the District of Columbia. What we propose to do now is divide the 15 major States into three groups: four States exhibiting the highest proportion of Indian children on reservations (Group 1), four States where the highest proportions are living in urban (non-reservation) areas (Group 3), and the remaining 7 major States which fall in between Groups 1 and 3 on these characteristics.

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Further analyses of this type will become possible in 1983 when the National Center for Education Statistics completes the task of reaggregating the 1980 Census data to conform to school district boundaries.

Table 2-5 displays the five groups, and shows how they compare in the aggregate on the three defining variables: size of Indian population, proportion on reservations, and proportion urban, non-reservation.

Before turning to an examination of data on participation in Part A for these State groups, it is appropriate to stand back and consider what we have created. There are two ways of improving our understanding of these groups especially of the first three groups which account for the 15 major Indian States. First, we can identify other characteristics which serve to further distinguish the groups--characteristics which "go along with" but are logically independent of the differences guaranteed by our definition. Secondly, we can examine the contribution of individual States to aggregate statistics for the groups that include those States. Doing this serves to set some cautionary limits on interpretations of differences between the three main groups. For example, referring back to Table 2-3, we can note that Arizona and New Mexico are the dominant States in Group 1, accounting for 73 percent of the 1976 Part A Indian In Group 2, Oklahoma stands out with 58 percent of the total, and nearly four times the contribution of Washington, the next largest State in this group. Finally, in Group 3, California is clearly the dominant State with 58 percent of the Part A count for 1976, while New York and Texas together account for only 11 percent of the group total. Because of these differences in relative size, it will sometimes be important to display State ranges on key statistics for the three groups to permit an evaluation of their internal consistency.

³ We omit mention of the rural, non-reservation column here since it is logically implied by the first two proportions.

TABLE 2-5. Definitional Characteristics of Five State Groups: 1980

Ages 5-17 Reservations Urban Largest 15 Indian States (at least 8,500, Ages 5-17): Group 1: Over 58% on reservations—Arizona, Montana, New Mexico, and South Dakota	Proportions Not on Reservation tion on and:	Proportion on	Estimated No.	D. Stadaton as Commo
Group 1: Over 58% on reservations—Arizona, Montana, New Mexico, and South Dakota				Definition of Groups
Group 1: Over 58% on reservations—Arizona, Montana, New Mexico, and South Dakota		e gre		Trade States (at
reservations—Arizona, Montana, New Mexico, and South Dakota		. •		east 8,500, Ages 5-17):
reservations—Arizona, Montana, New Mexico, and South Dakota		•		Grand 1: Oron 587 on
Montana, New Mexico, and South Dakota		•		
Group 2: Not in group 1 or 3Alaska, Minnesota, North Carolina, Oklahoma, Oregon, Washington, and Wisconsin		•		
or 3Alaska, Minnesota, North Carolina, Oklahoma, Oregon, Washington, and Wisconsin	.138	•675	111,800	
North Carolina, Oklahoma, Oregon, Washington, and Wisconsin				Group 2: Not in group 1
Oregon, Washington, and Wisconsin	*	*		or 3Alaska, Minnesota,
Group 3: Over 60% in urban areas—California, Michigan, New York, and Texas		τ.; ·		
Group 3: Over 60% in urban areas—California, Michigan, New York, and Texas	.408 .478	114	126 200	Oregon, Washington, and
urban areas—California, Michigan, New York, and Texas	.14	114	136,200	Wisconsin
Michigan, New York, and Texas		ı	`	
Texas	• .			
Remaining 35 States and District of Columbia (less than 8,500, Ages 5-17): Group 4: Twenty-six smaller States with Part A grants in 1980	.762 .182	056	02.700	
District of Columbia (less than 8,500, Ages 5-17): Group 4: Twenty-six smaller States with Part A grants in 1980	7,50	•050	92,700	Texas
<pre>than 8,500, Ages 5-17): Group 4: Twenty-six smaller States with Part A grants in 1980</pre>	•	•		Remaining 35 States and
Group 4: Twenty-six smaller States with Part A grants in 1980				
States with Part A grants in 1980				than 8,500, Ages 5-1/):
Group 5: No Part Anine StatesDelaware, Georgia, Hawaii, Kentucky, Mississippi, New Hampshire, Pennsylvania, Tennessee, and West Virginiaand				
Group 5: No Part Anine StatesDelaware, Georgia, Hawaii, Kentucky, Mississippi, New Hampshire, Pennsylvania, Tennessee, and West Virginiaand	.565 .266	160		
States Delaware, Georgia, Hawaii, Kentucky, Mississippi, New Hampshire, Pennsylvania, Tennessee, and West Virginia and	109 .505 .200	•103	.78,300	in 1980
States Delaware, Georgia, Hawaii, Kentucky, Mississippi, New Hampshire, Pennsylvania, Tennessee, and West Virginia and				Group 5: No Part Anine
Mississippi, New Hampshire, Pennsylvania, Tennessee, and West Virginiaand	9			States Delaware, Georgia,
Pennsylvania, Tennessee, and West Virginiaand			•	Hawaii, Kentucky,
and West Virginiaand	`			Mississippi, New Hampshire,
District of Columbia 10,800 .092 .510	•	•		Pennsylvania, Tennessee,
District of cordmita 70,900	.510 .39 8	.092	10.800 '	and west virginiaand
				PISCUICE OF COLUMNIA
TOTAL, UNITED STATES 429,800 .257 .45	257 .458 .285	•257	429 800	MOMAL INTER STATES

SOURCE: Special tabulations of the 1980 Census sample returns.



Other differences among the three main groups

In what follows, we will briefly highlight three of the major differences:

o Relative size of the Indian population

In Group 1, the range is from 5 to 8 percent (respectively Montana and New Mexico). In Group 3, the range is .2 to .8 percent (New York and California). In Group 2 (the "middle" group), four States (Minnesota, North Carolina, Oregon, and Washington exhibit intermediate percentages in the range of .9 to 1.5 percent. Wisconsin has a lower percent than California (.6 versus .8), while Oklahoma's 5.6 percent and Alaska's 16 percent exceeds one or all of the percentage figures in Group 1.

o 1970 Indian poverty rates

On this characteristic the three groups are perfectly ordered, with 45 to 60 percent of the Indian population (all ages) in poverty in the States comprising Group 1, 27 to 43 percent for the seven "middle" States, and a narrow range of 21 to 23 percent in the four "urban" States (Group 3).4

o Degree of local concentration of Indian children in public schools

Even in States where Indian children are a negligible fraction of the total school-age population, they could occur in local concentrations where they represent a significant percentage of all students in the schools they attend. New York is an exceptional State that illustrates this possibility. While Indian children account for only .3 percent of all public school enrollments, 48.5 percent of these Indian children are attending schools where they amount to at least 20 percent of the school's total enrollment. Surprisingly, most of the remaining Indian children in New York are not concentrated, a fact noted below.

Among the 15 major States, New Mexico, Arizona, Montana, and South Dakota rank 1, 3, 4, and 6 on a measure of high concentration (percent of Indian children attending schools where they amount to at least 20 percent of total enrollments). The Group 1 range on this characteristic is 56 to 75 percent (of all Indian children in the State attending public schools).



These 1980 Indian poverty rates are from American Indians, Volume 2, Report No. 1F, 1970 Census of Population. Poverty rates for 1980 are not yet available.

Turning to a measure of <u>low</u> concentration (percent of Indians in schools where they amount to less than 5 percent of enrollments), Texas, California, and Michigan lead the list with percentages of 63 to 78. New York ranks 6th, with 42 percent of its Indian students attending schools with less than 5 percent Indian enrollments. Exceptions to the "middle" rule for the 7 States in Group 2 are Oregon and Wisconsin (which rank 4th and 5th on the measure of <u>low</u> concentration) and Alaska and North Carolina (which rank 2nd and 5th on the measure of high concentration).

Summing up, with some exceptions already noted, Indians in the four "reservation" States comprising Group 1 are a highly visible, locally concentrated, and substantially disadvantaged fraction of the total population. Conversely, in the four "high-urban" States which make up Group 3, Indians amount to less than 1 percent of the population, are more evenly dispersed in public schools, and are economically least disadvantaged.

Comparisons of the State groups on particiption in Part A

We come finally to the first application of the State groups we have labored to establish. Table 2-6 represents a reaggregation of the data already presented for the 15 major States in Tables 2-3 and 2-4, and an interesting pattern does indeed emerge.

Table 2-6 shows that the four State groups in the Part A universe participated quite differently in the overall trends previously noted at the national level between 1976 and 1980. Nearly all of the growth in the number of grants and total students counted for Part A participation occurred among the States in the first two groups. Conversely, most of of the districts whose participation came to an end during this period are located in the States comprising Groups 3 and 4.

These estimates of degree of concentration are based on special tabulations of the 1976 Office for Civil Rights Survey file, containing information on nearly 16,000 individual school districts, of which about 7,000 had one or more Indian enrollments. For complete data on all the States, see Table 7 of Appendix D.

Changes in Part A Participation, 1976 to 1980, for Four State Groups

i.		of LEA	dian Students A LEAs	
State Groups	Total in 1976	% Change, 1976-1980	Total in 1976	% Change, 1976-1980
Group 1. Arizona, Montana, New Mexico, and South Dakota	129	+ 28.7	64,900	+ 17.7
Group 2. Seven other large States	472	. + 14.8	136,500	+ 11.8
Group 3. California, Michigan, New York, and Texas	304	- 7.2	62,600	- 1.6
Group 4. Twenty-six smaller Part A States	157	- 7.6	31,000	+ 1.3
TOTAL, PART A STATES	1,062	+ 6.9	295,000	+ 9.2

1976-1980 Part A Program File

D. Participation as Related to Size of LEAs

In this section we examine two questions related to district size. First, are Indian children more likely to be found in small school districts, and second, are small LEAs with significant Indian enrollments underrepresented in the Part A program? The reason for attaching some importance to these questions is the possibility that small school districts may be at a serious disadvantage when it comes to participating in voluntary programs having detailed formal application procedures which require significant amounts of professional staff time. If this is generally the case, it would have an unfortunate effect on children in rural areas where small school districts are typical, particularly if those districts have sizeable Indian enrollments. 30

Our evidence on both questions comes from the 1976 Office for Civil Rights "Survey" (actually, a complete census) of Public Elementary and Secondary School Districts. Using total enrollments of less than 300 as our definition of "small," the 1976 OCR data show that nearly 6 percent of all public school Indian enrollments occur in small LEAs, although the combined total enrollments of these districts amounts to just a little over 1 percent of the total public school population.

Table 2-7 is designed to locate Indian students within the public school universe described in the 1976 OCR data, with LEAs distinguished by their size and number of Indian enrollments. To produce these data, the 1976 OCR file was matched via computer with the Part A program file for 1976, using Office of Education State and local education agency codes. Of the 1,062 school districts on the program file, no corresponding record was found on the OCR file for 40 districts which received Part A funds in 1976.

Table 2-7 shows quite conclusively that among LEAs with at least 10 Indian students, smaller districts are more likely to be participating in the program than larger districts (48 versus 37 percent) and that Indian

^{6 1976} was the last year in which districts with total enrollments of less than 300 were systematically canvassed by the Office for Civil Rights.

Investigation of the unmatched Part A districts indicates four reasons for the failure to find corresponding records in the OCR file: (1) erroneous LEA codes (probably due to errors in transcription or data entry); (2) consolidations of previously separate elementary and secondary districts; (3) splits of previously unified districts; and (4) the participation in the Part A program of a few intermediate education agencies which are excluded from the OCR universe of local education agencies.

students in smaller districts are at least comparably represented in the program (74 versus 73 percent). These data also reflect the fact that Indian students tend to be concentrated in a relatively small number of districts.

D

TABLE 2-7: Relationship of Participation in the Part A Program to District Size, as Seen in the 1976 Office for Civil Rights "Census" of Public School Districts

				. ,		
	_	Larger LEAs	(300+ Students)	:	Smaller LEA	s (under 300)
		No. of LEAs	No. of Indians	:	o. of LEAs	No. of Indians
1.	All 15,722 LEAs in the OCR	•				
7'	universe	11,517	346,400		4,205	21,900
2.	6,792 LEAs with 1 or more	u		•		
	Indians	`5,833	346,400		959	21,900
3.	2,766 LEAs with 10+ Indians	2,425	334,800	er	341	20,100
	1,022 Matched Part A Districts	875	236,000	•	147	12,000
5.	40. Unmatched Part A Districts	23	7,800*		17	2,800*
,6.	Estimated for all 1,062 Part A Districts	898	243,800		164	14,800
7.	Line 6 as a Percent of Line 3	37.0%	72.8%	•••	48.1%	73.6%

^{*} These figures for Indian enrollments are from the Part A Program File. All-other Indian enrollments are based on the 1976 OCR file.

E. Documented Characteristics of Indian Students in Part A Districts

Efforts to document individual eligibility for participation in Part A go back to 1976, but by rather general agreement, the "506 Forms" requirement was not adequately implemented until just last year (1981).

Although the 506 forms requirement was originally mandated in 1976, the 1978 Quie amendment modified the kinds of information to be collected (H.R. 15, Section 1148), and these new requirements posed severe problems for many Indian groups where suitable records of the type contemplated were difficult to obtain or non-existent. Thus, the data which we report here represents a "first reading" from a documentation system which has only recently been put in place. Specifically, our estimates are based on an examination of Indian certification forms on file in a national sample of 116 Part A districts as of the Spring of 1982.8

A number of cautions need to be stressed in interpreting these data.

First, the estimates pertain to a universe of documents, and there is evidence that parents and local school officials are sometimes confused about the intent and meaning of specific portions of the 506 form.

Second, the documents permit no distinction between recipients and nonrecipients of Part A services, and finally, the sample is not representative of all Part A grant recipients. The reason for this last limitation is that our study of the 506 forms was an add-on to an evaluation study designed to examine the impact of Part A services in districts with a history of sustained participation (at least three years) and significant numbers of Indian children available to be served by the project (at least 31).

⁸ For a description of the sample design and methods used in compiling these data, see Appendix B.

Thus, about 230 LEAs with fewer than 31 Indian students or less than three years of continuous participation were systematically excluded from the sample. With these cautions in mind, we turn to an examination of a set of national estimates representing a little over 297,000 of the 328,300 Part A students counted in 1980.

TABLE 2-8: Estimates of Part A Indian Enrollments by Qualifying Characteristics, Based on Indian Certification Forms on File in a Sample of Part A Districts, Spring 1982

•	Estimates 506 Fo		Estimates from Previous Study	
Basis of Eligibility	Estimated Number	Proportion of Total	Proportion of Total	
Eskimos and Aleuts	13,000	•044	•049	
Members of federally recognized tribes	89,800	• .302	.761	
Members of State-recognized tribes	86,400	~.291	.117	
First-degree descendants	43,900	•148	.045	
Second-degree descendants	52,900	.178	.019	
All Others	11,400	.038	•011	
TOTALS	297,400	1.000	1.002	

SOURCE: Estimates given here from the 1981 report appeared in Table 9 (page 22). Estimates based on the 506 forms come from a special file created by Development Associates, Incorporated, under contract to the Department of Education.

Taking things in the order of their importance, estimates based on the 506 forms (1) indicate substantial numbers of second-degree Indians, (2) are markedly different from estimates presented in the 1981 Indian Definition Study, and (3) show a considerable number of first-degree descendants. In what follows, we will comment briefly on the last two points before taking up the more important question of the numbers (and distribution) of second-degree descendants.

The righthand column indicates how the 1981 study handled the problem of the defective questions on descendancy: the responses were "scaled-down" to fit into the space left by answers to the question dealing with membership in Federal or State-recognized tribes. By this method, instead of accounting for 99 percent of all Indian children (as the questions improperly demanded), first- and second-degree descendants accounted for only 6.4 percent of all eligible children. On the key question of second-degree descendants, this resulted in an estimate just one-ninth the size of that indicated by an examination of the 506 forms--1.9 percent as opposed to 17.7 percent. Overall, the two sets of estimates show good agreement on only one category of eligibility--that of Eskimo and Aleut children.

The number of first-degree descendants (amounting to nearly 15 percent of all documented children) is interesting for what it might tell us about circumstances preventing parents (at least one of whom is a tribal member) from enrolling their children in the same tribe. Among the possible explanations are racially-mixed marriages, marriages between members of tribes with different rules of descent, and families that have recently moved away from or lost touch with their tribal organizations. 9

The next table anticipates a question we will explore systematically in the concluding section of Chapter IV: What types of districts would be most affected by the exclusion of children who are Indian only by virtue of second-degree descent?



Further analysis of the data, designed to identify the characteristics of LEA's reporting most of these first-degree descendants, may shed some light on the subject. Due to time constraints, there has been no opportunity to explore the question.

TABLE 2-9. Estimated Numbers and Proportions of Second-Degree Indians Included in Part A Counts of LEAs Located in Four State-Groups: Spring, 1982

State Group		Indian St	ted Number of tudents Counted A Participation		
	No. of LEAs in Sample	Total	Second-degree only	Ratio of Second- degree to Total	
Group 1. Arizona, Montana, New Mexico,		: :			
and South Dakota	23	55,300	800	.014	
Group 2. Seven other large States	52	178,800	31,300	.175	
Group 3. California, Michigan, New York, and					
Texas	'24	38,400	16,600	.433	
Group 4. Twenty-six smaller Part A States	17	25,200	4,200	.166	
TOTAL, PART A STATES	116	297,700	52,900	.178	

SOURCE: Special file created by Development Associates, Incorporated based on an examination of 506 forms.

Table 2-9 indicates quite convincingly that the exclusion of seconddegree descendants would have the greatest relative impact in the four
major urban-Indian States (Group 3). Within this group, California was
represented by 13 sample LEAs, Michigan by 8, New York by 2, and Texas by
only 1. In the four major "reservation" States (Group 1), the estimated
number of second-degree children is so small that the question of differences
among the four States has no practical import.

With this final look at the State-groups introduced in this chapter, we turn next to the problem of estimating the numbers of Indian children not served by Part A districts. As indicated earlier, we will return to the question of the differential consequences of excluding second-degree Indians in Chapter IV.



CHAPTER III: ESTIMATES OF INDIAN CHILDREN NOT SERVED IN 1976 AND 1980

A. Indian Students in Public Schools Not Served by Part A in 1976

In 1976, the Office for Civil Rights Survey of Public and Elementary and Secondary School Districts obtained reports on enrollments by categories of race and ethnicity from the entire universe of 15,722 LEAs. Of these districts, 6,792 reported one or more "American Indian, Eskimo, and Aleut" students, for a total of about 368,300. This amounts to about six-tenths of one percent of all public school enrollments that year.

Federal categorical programs, LEAs receiving Part A grants in 1976 must be individually identified. We did this in the computer, using the Office of Indian Education's Part A Program File, and matching on State and LEA codes. By this method, we were able to identify 1,022, or 96 percent, of the 1,062 LEAs that received Part A grants in 1976. Given our "subtraction" approach (total OCR Indians less OCR Indians in LEAs with Part A grants) to estimating unserved children, non-matches, although small in number, were a matter of some concern. Our solution to this problem was to treat unmatched Program File LEAs (and the Indian enrollments shown in the file for those districts) as subtractions from the unmatched OCR totals. All we can be sure of, concerning this treatment of non-matches, is that it does not result in an overstatement of the number of children in unserved LEAs.

Table 3-1 shows that at least 109,700 (77,200 + 32,500) of the Indian students reflected in the 1976 OCR reports were unserved. Since 32,500

Inspection of unmatched records for Part A recipients in 1976 reveals that substantial numbers of Indian students were being served through a few intermediate education agencies or vocational-technical area schools, outside the OCR universe of local education agencies.

TABLE 3-1. Estimates of Served and Unserved Children Based on Numbers of Indian Students Reported to the Office for Civil Rights in 1976, with Comparisons to the Part A Program File for 1976

* W			Indian Students
	-		
LEAs		Reports*	File
1,062		258,600	295,000
2,579		77,200	84,800
3,641		335,800	379,800
3,392	• .	32,500	
7,034		368,300	
•		70.2%	77.7%
	1,062 2,579 3,641 3,392	Number of LEAs 1,062 2,579 3,641 3,392 7,034	Number of 1976 OCR Reports* 1,062 258,600 2,579 77,200 3,641 335,800 3,392 32,500 7,034 368,300

^{*} Program File Indian student counts are included in cases where no match was found in the OCR file.

SOURCE: Special tabulation of the combined (matched) 1976 OCR and Part A Program Files.

of these unserved children are in districts not represented in the Part A Program File, they represent a reduction in the overall proportion served by Part A. Thus, using the Program File only, one would estimate that 295,000 of 379,800 Indian students were available to be served in Part A districts, for a participation rate of 77.7 percent. If the OCR enrollment figures are relied on, however, and the additional Indian enrollments in LEAs not represented in the Program File are included, the participation rate drops to 70.2 percent.

^{**} Note that unmatched Program File LEAs are treated as a subtraction from unmatched OCR LEAs. This treatment assumes that the OCR file is complete and that all LEAs represented in the Program File are also in the OCR universe. Stated differently, the assumption is that a computer match would have been found for all Program File records if both sets of records had completely accurate State and LEA codes.

The other thing which must be observed about the comparisons offered in Table 3-1 is that OCR Indian enrollment figures are lower than the Part A student counts by about 12 percent. There is no necessary contradiction in this, since children counted for Part A participation—especially under the second degree descendant clause—may not be reported by local school officials as belonging to an American Indian race, but the differences do bear closer inspection. We will return to this subject in the next chapter, and data for individual States based on fully matched comparisons will also be found in Table 3 of Appendix D.

B. Estimated Numbers of Unserved Indian Children in 1980

Estimates for 1980 are on less solid ground because there is no way to link the 1980 OCR or 1980 Census data to individual LEAs. Unlike the 1976 OCR "survey" (actually a census of all LEAs), the 1978 and 1980 OCR surveys were samples, and while they provide excellent estimates for many segments of the public school universe in those years, their coverage of any group amounting to less than 1 percent of the total school population is open to question. Work is presently underway at the National Center for Education Statistics to directly link much of the 1980 Census data to individual school districts, but estimates of Indians enrolled in public schools have not yet been tabulated for small enough areas to approximate school-district boundaries.

Given the limitations just noted, indirect or relatively crude estimates are the best we can do for 1980. Our first estimate is a "1980" estimate in only one sense: it looks at Indian enrollments in LEAs participating or not participating in the Part A program as of 1980, but the enrollments in question are those reported four years earlier, in 1976. In other words, we have simply reaggregated our matched Program File and 1976 OCR data to reflect changes in LEA participation between 1976 and 1980.

TABLE 3-2. Calculation of Part A Participation Rates in 1980

Based on 1976 Reports of Indian Students

Re	Part A Participation and presentation in Program File	Number LEAs	of	Number of 1976 OCR Reports*	Indian Students 1976 Program File
1.	Part A in 1976 and 1980	859		242,500	274,800
	Part A only in 1980	276	, ,	20,600	22,400
3.	Notal Part A in 1980	1,135		263,100	297,200
4.	1976 OCR Totals	7,034		368,300	
5.	1980 Participation Rate based on 1976 OCR reports (Line 3 as a percent of Line 4)			71.4%	

^{*} Program File student counts are included in cases where no match was found in the OCR file. For example, of the 20,600 shown on Line 2 of the OCR column, the 61 non-matches account for 2,000 Indian students.

SOURCE: Special tabulation of the combined (matched) 1976 OCR and Part A Program Files.

A comparison of the first line of this table with Table 3-1 will show that 859 of the 1,062 LEAs participating in 1976 were also participating in 1980. Thus, by subtraction, 203 LEAs with 1976 OCR Indian counts of 16,100 had left the program by 1980, while, as the table above shows on Line 2, 276 new LEAs with 20,600 1976 OCR Indian students came into the program. This difference produces a slight reduction in the unserved total, and raises the participation rate marginally to 71.4 percent.

Our next estimate for 1980 is much more ambitious, since it attempts to account for the entire school-age Indian population, but it is also cruder. As the structure of Table 3-3 indicates, the problem of estimating Indian children in Part A LEAs can be approached logically as involving a series of subtractions from the total number of school-age Indian children.

The danger in using this approach is that errors may accumulate, particularly when we are forced to rely on different sources for estimates of the separate components which make up the total unserved group. Perhaps the best way to express our misgivings about the estimates we are about to present is to say that they may represent only a picture constructed with numbers. We have done our best to utilize the best information available in estimating each of the components, but we have also had to introduce some rather arbitrary "adjustments" in order to make the pieces of the picture fit together. With these cautions in mind, we turn to an examination of a set of national estimates designed to account for all the relevant categories of unserved Indian children.

Our estimate of unserved children in 1976 (Table 3-1) was about 110,000. Here (Table 3-3, bottom line) we estimate 156,500. The main difference is that the latter figure includes school-age Indian children not enrolled in school plus those enrolled in private schools. Comparing the participation rates calculated for the two years, we estimated that about 70 percent of Indians in public schools were attending Part A schools in 1976, and Table 3-3 estimates 79.4 percent. The base of the calculation for 1980 includes about 7 or 8 thousand enrollments in tribal schools operated under contract with the Bureau of Indian Affairs, and eligible for participation in Part A, but even after adjusting for this difference, we believe a real increase in overall participation rates would remain for the period 1976 to 1980. Note that on Line C.2.1 we have also shown what an 86 percent rate of actual service within Part A districts would mean, as applied to our estimates. This was the rate estimated by the 1980 special survey of Part A districts conducted in support of the previous study.



TABLE 3-3. Estimates of Served and Unserved Indian Children of School-Age for the United States and Five State Groups: 1980

	A 1 1	_ E s t i	mate	s in T	housa	nds_
		Group 1	Group 2			Group 5
Components of Indians		AZ,MT,NM				
Eskimo & Aleut (5-17)	U.S.	and SD	States *	and TX	Part A	No Part A
1 Total (1990 comple)	429.8	11.8	136.2	92.7	78.3	10.8
 Total (1980 sample) Not enrolled 	429.0	14.9	12.2	6.8	7.3	1.2
1.2 Enrolled (K-12)	387.4	96.9	124.0	85.9	71.0	9.6
1.2 Entolled (R-12)	307.4	90.9	124.0	8	71.0	9.0
1.2.1 Private, not on				V		•
reservation	17.0	2.7	4.5	5.1	3.8	1.9
1.2.2 "Private" but on				•		
reservation	10.7	8.5	•8	.1	1.3	
1.2.3 Public	359.7	85.7	118.7	80.7	65.9	8.7
					•	•
A. Public + "private" on				•		
reservation	370.4	94.2	119.5	80.8	67.2	8.7
B. In BIA schools	26.2	17.3	4.2	•4	4.3	
C. Potential Part A	344.2	76.9	115.3	80.4	62.9	8.7
of roccinctar rate invitor	34462	, 003	113 (3	00.4	02.00	٠,
C.1. Non-Part A LEAs	70.9	2.9	16.9	17.1	25.3	8.7
C.2. Balance (Part A)	273.3	74.0	98.4	63.3	37.6	
C.2.1 Part A & served	235.0					
C.2.1 Part A & served	38.3	•				
Indians in Part A LEAs as						
a percent of potential .		>	•	. *	•	
Part A (Line C)	79.4%	96.2%	85.3%	78.7%	59.8%	0.0%
Total unserved (of age-	156 5	27.0	27.0	20. /		10.0
group) excluding C.2.2	156.5	37.8	37.8	29.4	40.7	10.8
	_					

SOURCES:

Lines 1 through 1.2.3: Special tabulations of the 1980 Census sample returns.

Line B: Bureau of Indian Affairs Summary of Fall 1978 Enrollments in BIAoperated Boarding and Day Schools. Enrollments have been reduced by one-third. (See page 39 for discussion of this adjustment.)

Line C.1: 1976 OCR Indian enrollments in non-Part A LEAs (as of 1980), reduced by the ratio of 1980 OCR Indian enrollments to 1976 Indian enrollments within each State group and then summed across to obtain the U.S. total. (See Table 9 in Appendix D for State-specific comparisons of the 1976 and 1980 OCR figures.)

Lines C.2.1 and C.2.2: These figures (U.S. total only) are .86 and .14 of Line C.2. These proportions were estimated in the 1981 Indian Definition Report, based on locally reported estimates for a national sample of Part A districts surveyed in May of 1980.

Careful study of the treatment of the numbers in Table 3-3, as well as the notes supplied at the bottom of the table, will raise a good many questions in the minds of thoughtful readers. Hopefully, the next section will answer some of those questions. If still other questions remain unanswered in the reader's mind, then that is a good reason for regarding the estimates just presented as suspect or in need of correction.

C. Problems in Estimating Served and Unserved Children

Following the logical sequence depicted in Table 3-3, the principal estimation problems are briefly identified and discussed below:

Age-bounds on the school population

Analyzing school enrollments for children ages 5-17 probably makes more sense than any other equally convenient approach, but it is logically defective, particularly when age is reckoned as of April 1 (the decennial Census reference date) rather than October 1. In the fall, most 5-year-olds are enrolled in kindergarten, but in the spring, many have yet to start school. This partially invalidates inferences about school dropouts based on proportions of children ages 5-17 not enrolled in school. A further problem occurs when enrollments in kindergarten through grade 12 are reported without any age restriction (as in the OCR survey) and then treated as a subtraction from all children 5-17, since substantial numbers of 18 and 19 year-olds are enrolled in high school. This is particularly true of educationally disadvantaged groups who may progress more spowly.

Reports of enrollment in "regular" and "private" schools

Since the Census depends on self-enumeration, the meaning of enrollment reports is critically dependent on the household respondent's interpretation





of these terms.² While not generally a problem at elementary and secondary school levels for most of the population, some Indian parents find themselves confronted with unusual problems. Is a tribally-controlled school, operated under a contract with the Bureau of Indian Affairs, a "regular" school within the meaning of the Census question on school enrollment, and if so, is it public or private? And what about the boarding and day schools staffed and operated directly by the Bureau of Indian Affairs?

Table 3-3 exhibits the only clue we have to how enrollments in special (but "regular" in the sense of the Census question dealing with enrollment) schools are reported in the Census data. Our guess is that the private enrollments are overstated, and we have therefore included "private" enrollments of children living on reservations as belonging to the public sector.

Enrollments in BIA schools

As noted, we have arbitrarily reduced the figures reported for these schools in the fall of 1978 by one-third. There are three reasons for doing this. First, these schools generally experience substantial mid-year attrition, so that some students could properly be counted as enrolled in the fall, but also be counted as among those not enrolled by the following April. Second, enrollments may have declined since 1978. Finally, there may be some tendency on the part of BIA school administrators to exaggerate their enrollments—perhaps merely by including in their reports students who only stayed a week or two before leaving.³



Analysis of the 1970 Census data shows, for example, that enrollments in "private" colleges were substantially overstated, while reported enrollments in public colleges were correspondingly too low. In this case, the problem may be that some respondents equate "public" with free (i.e., no tuition charges).

³ Unadjusted BIA enrollment figures can be found in Table 8 of Appendix D.

Decline in Indian enrollments reported to OCR

This subject will be examined in Section C of the next chapter. Here it only needs to be noted that our estimate of Indian enrollments in non-Part A LEAs treats that decline as real, and this has the effect of lowering our estimate of total unserved children. The net reduction in the United States total (Line C.1 of Table 3-3) amounts to 34,300. This is probably excessive, but has the merit of permitting us to describe our estimate of Indian race children in Part A districts as generous. This, in turn, strengthens our conclusion that actual Part A Indian student counts are substantially greater than race-based estimates of the same group. The import of this conclusion is discussed in the next chapter.



In this chapter we will examine four possible ways of defining eligible Indian children. The first two are based on the 1980 Census data, and therefore represent estimates based on the unverified reports of household respondents. Essentially these first two sets of estimates can be thought of as corresponding to a definition which gives official standing to a parent's representation that the child is "of the Indian race," affiliated or "identified" with a specific tribe, or predominantly of "Indian ancestry."

The third type of estimate is based on local school district reports to the Office for Civil Rights on the racial and ethnic composition of their students, including the category "American Indian, Eskimo, and Aleut." While it is unlikely that anyone would want to given official sanction to totally unsupported representations of local school districts, those representations are nevertheless important to take into account. It is virtually axiomatic that the Indian student who goes unrecognized and uncounted by school administrators is unlikely to benefit from locally provided educational services for Indians.

The last set of estimates speaks directly to one of the mandated questions: What would be the effect of modifying the statutory definition of Indian to exclude children presently eligible under the second-degree-descendant clause?

A. Racial and Tribal Self-Identification

Table 4-1 presents three progressively smaller Census-based estimates of Indian ("race") children ages 5-17 in public schools: total, those for whom tribe was reported (or living on a reservation), and that portion of the total estimated to be enrolled in LEAs actually participating

in the Part A program in 1980. These are arrayed alongside the actual number of Indian students counted for participation in Part A for the (same year.

TABLE 4-1. Alternative Census-Based Estimates of Indian Race and Tribally Identified Children Enrolled in Public School in 1980

	1980 Cer	mates innsus Indian Race 5-17 in Public	e Children,	ands
State Group	Total Sample Estimate	Total Less Those Off Reservations Not Reporting Tribe	Portion of Total in 1980 Part A LEAs	Actual 1980 Part A Student Counts
Group 1: Over 58% on reservations—Arizona, Montana, New Mexico, and South Dakota	85.7	81.4	74.0	74.8
Group 2: Not in group 1 or 3Alaska, Minnesota, North Carolina, Oklahoma, Oregon, Washington, and Wisconsin	118.7	103.3	98.4	153.5
Group 3: Over 60% in urban areas—California, Michigan, New York, and Texas	`80.7	63.8	63.3	61.2
Group 4: Twenty-six smaller States with Part A grants in 1980	65.6	53.8	37.6	38.8
Group 5: No Part A nine States-Delaware, Georgia, Hawaii, Kentucky, Mississippi, New Hampshire, Pennsyl- vania, Tennessee, and				L
West Virginiaand District of Columbia	8.7	5.8	-0-	-0-
TOTAL, UNITED STATES	359.7	308.1	273.3	328.3

SOURCE: Special tabulations of the 1980 Census sample returns, Table 3-3 (Line C.2), and Part A Program File.

The principal finding which stands out in this table is that racial self-identification procedures used in the 1980 Census yielded fewer Indian children than counted for participation in Part A (after subtractions for children outside the Part A universe). In the case of Group 2, the Part A count exceeds the Census estimate for the total public school universe by 29 percent. This is almost wholly a result of Oklahoma's contribution to Group 2, since the Part A count exceeds the Census estimate of public school Indian enrollments by 30,600.

Once again, we have a table for which cautious interpretation needs to be urged. Specifically, these estimates should not be viewed as indicating what would happen if parental identification of the child's race was adopted as the basis for eligibility under Part A. Almost certainly, a relaxation of the present certification requirements would bring new districts (or ones participating prior to 1980) into the program, thus invalidating the comparison between Part A counts and the Census-based estimates for the LEAs participating in 1980.

An equally important qualification is that answers to Census-style questions will vary as a function of the context in which they are presented. As noted and discussed in Appendix C, this is even true of the 1980 Census "race" question, as presented on the "short-form" (which produced a complete-count estimate of Indian children) or the long-form on which our sample estimates are based.

For these reasons, we prefer to offer a carefully qualified conclusion: on the evidence of Table 4-1, we <u>suspect</u> that if parents were asked to make a one-time designation to the school of their child's race, the number of Indian children in Part A LEAs would be lower. In the next

section, however, we will see evidence from the 1980 Census which suggests that such designations might conceivably yield larger numbers.

B. Inclusion of Indian Ancestry Children

In addition to the 1980 Census "race" question (see page 3 of Appendix C) the sample questionnaire asked, "What is this person's ancestry?" and Census coders recorded up to two write—in answers to the question. In this section, we examine estimates of school—age children reported to be of some race other than American Indian, Eskimo, or Aleut for whom only Indian ancestry was indicated. Table 4-2 examines the distribution of such children as potential additions to "Indian" totals for the public school universe.

TABLE 4-2. Indian Race and Only-Indian-Ancestry Children Enrolled in Public School: 1980

			*
State Groups	Indian "Race (000s)	Only Indian Ancestry (000s)	Ratio of Ancestry to Race
Group 1. Arizona, Montana, New Mexico, and South Dakota	85.7	3.6	•04
roup 2. Seven other large	118.7	21.9	.18
Group 3. California, Michigan, New York, and Texas	80.7	35.9	•44
roup 4. Twenty-six smaller tates with Part A grants	65.6	69.3	1.06
Group 5. Nine States and the District of Columbia with no Part A grants	8.7	28.5	3.17
rotal, united states	359.7	159.2	.44

SOURCE: Special tabulations of the 1980 Census sample returns.

Among the three groups comprising the 15 largest Indian States, the striking fact is that Indian ancestry (but not race) is proportionally lowest in the Indian reservation States, amounting to just 4 percent of the Indian race children, and highest in the urban-Indian States. Finally, in the 9 States and the District of Columbia where there is no Part A participation (Group 5), Indian ancestry children are three times more numerous than those reported to be of the Indian race.

These data are further analyzed in Appendix C, and displayed for individual States in Table 10 of Appendix D. Here, they serve to demonstrate that categories of "Indian" identification are highly expandible; particularly in States where Indian groups rarely constitute recognized segments of the local community. 1

C. OCR Reports of Indian Enrollments

Data on trends in OCR estimates of Indian enrollments for individual States are presented in Table 9 of Appendix D. Here we will limit ourselves to matched comparisons of the OCR enrollments and Part A student counts for 1976, and then conclude with an examination of national trends relative to Census-based estimates for the same points in time.

Matched Comparisons with Part A

Table 4-3 focuses on 1,022 Part A LEAs (1976) for which matches were obtained in the OCR file for the same year. Once again, we see a familiar pattern for the four State groups involved in this comparison: Part A student counts acceed the OCR Indian race reports by the greatest proportion in the four major urban-Indian States.



Children of mixed ancestry which includes Indian ancestry are even more numerous. Our Census tabulations indicate a total of slightly over one million such children in the public school universe.

TABLE 4-3. Comparison of 1976 OCR and Part A Indian Student Reports for Four Groups of States and the United States

State Groups*	Total Indian Students Re- ported to OCR in 1976**	Total Indian Students Re- ported for Part A Grants**	Ratio of Part A to OCR
Group 1. Arizona, Montana, New Mexico, and South Dakota	59,200	62,800	1.061
Group 2. Seven other large Indian States	111,700	130,900	1.172
Group 3. California, Michigan, New York, and Texas	47,800	60,600	1.268
Group 4. Twenty-six smaller States with Part A grants	29,300	30,100	1.027
TOTAL, UNITED STATES	248,000	284,400	1.147

^{*} For explanation of these groups, see Table 2-4.

Referring back to Table 4-1, it is also noteworthy that the 1976 OCR figure for Group 2 (111,700) exceeds our 1980 Census-based estimate of Indian race enrollments in Part A LEAs for this group (98,400). As our next analysis will demonstrate, the 1976 OCR totals are too large to be reconciled with the 1980 sample estimates of the total Indian school-age and public school groups.

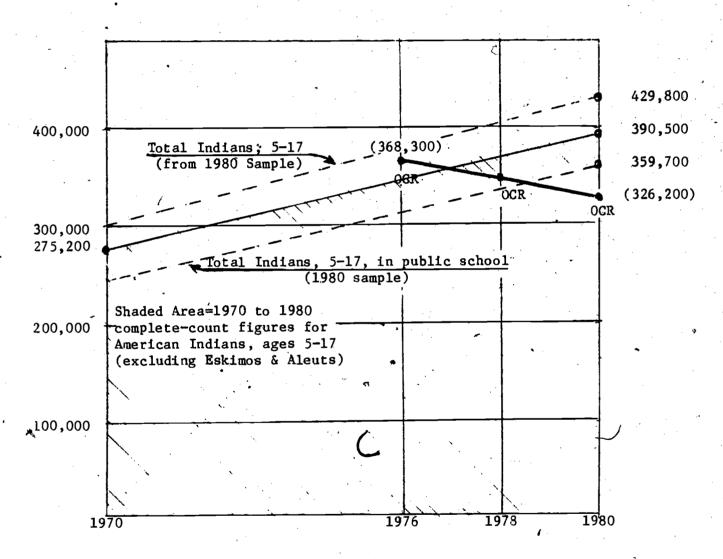
Changes in OCR estimates of Indian enrollments, 1976-1980

Figure 1 does three things: it exhibits the assumption of straightline growth in the size of the school-age Indian population between 1970 and 1980, it plots the 1976, 1978, and 1980 OCR estimates, and it offers a graphic comparison of these estimates with the Census data.

^{**} Matched LEAs only. Enrollments in 40 unmatched Part A districts are omitted.

Figure 1

Comparison of OCR Estimates of Indian Enrollments in Public School, 1976 to 1980, with T970 and 1980 Census Estimates and Straight-Line Interpolations



SOURCE: Table 1 of Appendix C (1970 to 1980 complete-count),
Table 9 of Appendix D (1976, 1978, and 1980 OCR), and
Table 10 of Appendix D (1980 sample estimates).

Figure 1 shows (in the shaded area) how the American Indian population would have grown between 1950 and 1980 if it had grown uniformly. As discussed in Appendix C, the 1970 and 1980 data points have been adjusted for comparability (Eskimos and Aleuts are excluded from the 1980 figure and the 1970 figure has been adjusted for age-specific estimates of Indian undercounts), but the 1980 figure includes substantial numbers of children who were alive at the time of the 1970 Census and not reported to be of the Indian race. Whatever the factors are that contribute to changes in racial identification, there is no reason to believe that they operated uniformly over the decade of the seventies. Thus, the assumption of uniform growth is entirely artificial and subject to correction in the light of other information.

The only other information we have on this point comes from the OCR surveys in 1976, 1978, and 1980. Not only do these observations indicate a decline in the number of Indians enrolled in public school, but the 1976 figure (368,300) exceeds the 1980 estimate of public school Indians by 8,600. By 1980, however, the OCR figure has dropped to a level of 33,500 below the Census estimate for that year.

In comparing the OCR and Census figures, it is important to remember that the OCR reports are primarily an expression of the racial perceptions and sensitivities of the school officials who make these reports, rather than of the parents of the students, as is the case with the Census. One would wish for a mid-decade comparison, but the only possible candidate—the 1976 Survey of Income and Education—is unsatisfactory. On the

Although adequate for estimating proportions of school-age children in poverty (its chief purpose), this survey used a much simpler race question (White/Black/Other), the questions were administered by interviewers, and the cluster-sample design may have resulted in substantial underrepresentation of Indian groups. Using Indian "origin" in conjunction with "Other" race, our tabulations of these data yield estimates of only 174,800 such children, ages 5-17.

scant evidence available to us here, we <u>suspect</u> that factors contributing to Indian identification peaked in the mid-seventies. This amounts to the speculation that if the 1980 Census question had been administered in 1975 or 1976, a higher estimate would have been obtained than the one we have for 1980.

If correct, this speculation has important implications for our study, because it means that estimates of eligible children will rise and fall in response to factors totally independent of the definition adopted or the questions used to implement that definition.

D. Impact of Excluding Children Recorded as Second-Degree Descendants

Here we draw on data collected in the Spring of 1982, based on an examination of Indian student certification forms (the "506" forms) on file in a national sample of Part A districts. Limitations of these data are discussed in the final section of Chapter II (page 28), and a description of the methods used in compiling the data will be found in Appendix B."

Our first examination of these data showed that nearly 18 percent of the estimated 297,700 Part A students in the sample universe were Indian only by virtue of second-degree descent. We saw further that proportions of second-degree children ranged from a low of 1.4 percent in the four major States with high proportions of children on reservations to a high of 43.3 percent for the four "urban" States (Table 2-9, page 31). Ideally, in evaluating the impact of specific changes in eligibility for a formula program such as Part A, one would prefer to have estimates for individual States. Unfortunately the sample is not large enough to permit this.

What we can do, however, is to subdivide Group 2 (represented by 52 sample LEAs) into Oklahoma (25 LEAs), and the remaining 6 States in Group 2 (27 LEAs). Doing this reveals dramatic differences within the original group of 7 States, as evidenced by the estimates of impact in Table 4-4.

TABLE 4-4. Distribution of Total Documented Part A Eligibles, With and Without Second-Degree Descendants: Spring, 1982

	Proportion	of Documented Elig		
	With Second		Ratio of	
Areas	Degree	Without Second	Share	
MC C G G	Children	Degree Children	Without to	
	(Total=297,700)	(Total=244,800)	Share With	
Andreas New Meyico	,	,		
. Arizona, Montana, New Mexico,	.186	•223	1.20	
and South Dakota (Group 1)	•100	•223	1110	
(2)	•155	•075	•48	
. Oklahoma (Part of Group 2)	•133	•075	• 40	
. Alaska, Minnesota, North				
Carolina, Oregon, Washington,	•	4		
	•			
and Wisconsin (balance of	•446	•528	1.18	
Group 2)	• 440	•520		
California Michigan New			.*	
California, Michigan, New	.129	•088	•68	
York, and Texas	•127	•••	•	
. All Other Part A States	٠.		•	
• •	•084	•086	1.02	
(Group 4)	•004		6 ×	
TOTAL	1.000	1.000	1.00	
IUIAL	1.000	,		

SOURCE: Special Study of 506 Forms (see Appendix B).

On the assumption that eligibility was redefined to exclude second-degree Indians presently counted for Part A, and further assuming constant funding levels, the States comprising Group 1 would experience a 20 percent increase in Part A allocations, while Oklahoma's share would decline by 52 percent. The four "urban" States, as a group, would lose



32 percent, and the 26 smaller Part A'States would realize a modest 2 percent increase. Note that within Group 2, in contrast to Oklahoma's loss of more than half its present share, the remaining 6 States would realize (again, as a group) an 18 percent increase.

When the 116 LEAs in this sample are classified by the type of area they serve, we find they are about evenly divided among those serving children who live on-or-near reservations (43), children in non-reservation rural areas (35), and children living in urban places or metropolitan areas (38). Comparing these three groups with respect to proportions of second-degree children, we find significant differences in the expected direction, with only 3.7 percent of current eligibles qualifying under the second-degree clause in LEAs near reservations, and 43.2 percent second-degree in the urban LEAs. When the four State Groups and Oklahoma are further divided into these three types of LEAs, some interesting differences appear.

TABLE 4-5. Proportions of Second-Degree Children Among All Documented Part A Eligibles in LEAs Classified by State Areas and Type of Local Area Served: Spring, 1982

			•	
Area	Reservation	Other Rural	Urban/Metro	
rizona, Montana, New Mexico, nd South Dakota (Group 1)	.012 (N=19)	.000 (N=1)	.036 (N=3)	.014
clahoma (Part of Group 2)	·	.543 (N=18)	.693 (N=7)	.603
laska, Minnesota, North prolina, Oregon, Washington, nd Wisconsin (balance of coup 2)	.062 (N=14)	.012 (N=5)	.089 (N=8)	.026
alifornia, Michigan, New ork, and Texas	.045 (N=4)	•508 (N=6)	.529 (N=14)	.433
1 Other Part A States Group 4)	.107 (N=6)	•196 (N=5)	· .219 (N=6)	.166
ALL AREAS REPRESENTED	•037	•145	.432	.178
ב ב ב	rizona, Montana, New Mexico, ad South Dakota (Group 1) Llahoma (Part of Group 2) Laska, Minnesota, North Irolina, Oregon, Washington, ad Wisconsin (balance of roup 2) Llifornia, Michigan, New Ork, and Texas Ll Other Part A States Group 4)	rizona, Montana, New Mexico, .012 ad South Dakota (Group 1) (N=19) Llahoma (Part of Group 2) Laska, Minnesota, North Irolina, Oregon, Washington, .062 ad Wisconsin (balance of (N=14) Toup 2) Llifornia, Michigan, New .045 ark, and Texas (N=4) Ll Other Part A States .107 Group 4)	rizona, Montana, New Mexico, .012 .000 ad South Dakota (Group 1) (N=19) (N=1) clahoma (Part of Group 2)543 (N=18) aska, Minnesota, North arolina, Oregon, Washington, .062 .012 ad Wisconsin (balance of (N=14) (N=5) coup 2) clifornia, Michigan, New .045 .508 ork, and Texas (N=4) (N=6) cl Other Part A States .107 .196 Croup 4)	rizona, Montana, New Mexico, .012 .000 .036 .036 .04 South Dakota (Group 1) (N=19) (N=1) (N=3) .000 .036 .000 .000 .000 .000 .000 .000

SOURCE: Special Study of 506 Forms (See Appendix B).

For all five State areas, urban/metropolitan areas exhibit higher proportions of second-degree eligibles, but comparing the actual proportions within the urban/metropolitan column on the right of Table 4-5, there are impressive differences. Oklahoma, represented by 7 sample LEAs in this column, has a value of 69 percent second-degree children, while the remaining six States in this "middle" group collectively have a value of just under 9 percent. Within the "urban" States represented on Line 4, the 14 sample LEAs serving children in urban or metropolitan areas would collectively lose 53 percent of their current eligibles if second-degree descendants were eliminated from the statutory definition. By almost any standard, these data show that local impacts on Part A projects would sometimes be severe.

CHAPTER V: SUMMARY AND CONCLUSIONS

As noted in Chapter I, the first step leading to the passage of the Indian Education Act was the creation of a subcommittee charged with studying all aspects of Indian education. The Part A program owes its existence in large measure to the work this committee did in documenting the unmet educational needs of Indian children. Thus, it is appropriate that our summary of a report dealing with eligibility for service under this program should commence with a brief review of the evidence bearing on educational needs.

A. Relative Differences in Educational Needs

Our examination of differences related to educational needs has been limited to just three characteristics, but they all point to the same conclusion: the educational needs of Indian children are greatest in States where large proportions of Indians are still living on reservations. In the major "urban" States, Indian children continue to exhibit educational disadvantagement, relative to local and national norms, but this disadvantagement is much less severe.

Poverty

In 1970, poverty rates for the Indian population (all ages) were nearly three times higher in the four major States with large numbers on reservations, compared with the major urban States. Poverty differentials in the latter States (Indian versus non-Indian rates) were generally close to two-to-one, indicating substantial relative disadvantages for Indian children, but in the major "reservation" States, these differentials approach four-to-one.

The relationship between poverty and educational disadvantagement is well known: poor children score lower on most measures of achievement, are



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more likely to fall behind their age-peers in school, and are more likely to drop out before completing high school. In recognition of these relationships, poverty statistics are the principal basis for allocating Federal assistance to local school districts for compensatory education programs under Chapter 1 of the Education Consolidation and Improvement Act (formerly Title I, ESEA). In this connection, it is reassuring to know that about 71 percent of the LEAs applying for Part A grants in 1980 reported participation in the Title I program.

School dropout rates

Although far from perfect, proportions of children ages 5-17 not enrolled in school are highly correlated with more direct measures of school dropout rates. In Fairfax County, Virginia and Montgomery County, Maryland, for example, public and private school enrollments (K-12) account for about 99 percent of the total age-group 5-17, which is what one would expect for these highly affluent areas in suburban Washington.

Once again, the four major urban States exhibit the lowest figure on this measure of disadvantagement, with 7.3 percent of their school-age Indian children not enrolled in school, and once again the "reservation" States have nearly twice this proportion (13.3 percent). Statistics of this type for particular areas are highly stable from year to year, and this means that many Indian children now available to be served in our schools are on their way to becoming a dropout statistic in some future year.

Use of an Indian language in the home

Our special tabulations of the 1980 Census sample returns (which unfortunately did not include current measures of poverty) indicate that

about 103,000 Indian children in public schools are from homes where an Indian language is regularly spoken. This amounts to about 29 percent of the 360,000 Indian children in the public school universe.

Language-usage may be viewed as one measure of cultural assimilation. On this view, we should not be surprised to find that the proportion of children in Indian-language homes is lowest in the major urban States (7.3 percent), and highest in the four States where most of the children are living on reservations (71.3 percent).

The 14.4 percent figure for Group 5 (see Line C.2 in the righthand column of Table 5-1) is mostly a reflection of the fact that use of an Indian language was reported for all the one thousand Choctaw reservation children in Mississippi.

B. Review of Differences Among State Groups

The last table to be presented sums up our major findings for the five State groups comprising the nation. In looking for patterns in the data on Part A participation, we examined a number of variables which might serve as a basis for grouping States with similar characteristics. We settled on four: the size of the school-age Indian population (major States were defined as those with at least 8,500), the proportion of children living on reservations (the four States in Group 1 were highest among the 15 major States), the proportion of children living in urban, non-reservation areas (Group 3 represents the four highest major States), and Part A participation of one or more LEAs in the State.

TABLE 5-1. Comparisons of Five State Groups, Defined by Size of School-Age Indian Population, Percent Urban, Percent on Reservations, and Participation in the Part A Program

			rgest India			
	State Groups	4 High % Reserv.: AZ, MT, NM, SD	7 Inter- mediate States*	4 High % Urban:CA MI,NY,TX	26 Other Part A States	Remaining States & D.C. **
	-	HI, NH, 5D	States	HI, NI, IA	Juaces _	D.G.
Α.	Defining Characteristics		•		,	
	1. Size of Indian popula- tion, ages 5-17 (1980					
	sample)	111,800	136,200	92,700	78,300	10,800
	areas	18.7%	40.8%	76.2%	56.6%	51.0%
	3. Percent on reservations4. Children counted for Part A grants—percent	67.5%	11.4%	5.6%	16.8%	9.3%
	of national total	22.8%	46.8%	18.6%	11.8%	-0-
В.	Total Indian Population			Ş		
	 Percent of total population (all races) Percent in poverty,1970 	6.2%	1.8%	0.5%	0.3%	0.1%
	Highest State rate	60.4%	43.5%	22.9%	NA	N A
	Lowest State rate	45.1%	26.6%	21.2%	NA	NA
c.	School-Age Indians, 1980			•		
	 Percent not enrolled Percent in homes where 	13.3%	9,0%	7.3%	9.3%	11.1%
	Indian language is used	71.3%	20.0%	7.2%	16.6%	14.4%
D.	Differences in Estimates		÷ .			,
	1. Ratio of sample estimate to complete-count for		^		. .	1
	Indians, 5-17, (1980) 2. Ratio of only Indian	1.01	1.02	1.14	1.09	1.19
	ancestry to Indian race 3. Ratio of Part A to OCR	.04	•18	.44	1.06	3.17
	reports in 1976***	1.06	1.17	1.27	1.03	
Ε.	Proportion of Second-Degree					•
	Children of all 1982 Part A Documented Students	.014	.175	•433	.166	

SOURCE: See text tables and appendices.

^{*} Alaska, Minnesota, North Carolina, Oklahoma, Oregon, Washington, and Wisconsin.

^{**} Delaware, Georgia, Hawaii, Kentucky, Mississippi, New Hampshire, Pennsylvania, Tennessee, and West Virginia.

^{***} Matched LEA's only.

Along the way in our analysis, we have accumulated a good many observations about these five groups of States, and as Table 5-1 indicates, there is a pattern to the patterns. Looking just at the contrasts between Groups 1 and 3 (i.e., the contrasts within the 15 major Indian States), we find that alternative measures, estimates, and definitions of schoolage Indian children (and specifically, of eligible children in Part A districts) are most stable and consistent for Group 1, where the educational disadvantagement of Indian children is greatest, and least stable or consistent in the major urban States which exhibit less severe levels of disadvantagement. In this light, the findings presented in Chapter II concerning growth in Part A participation between 1976 and 1980 (see Table 2-6 on page 25) are reassuring, because the States with the most stable Indian counts and the greatest educational needs registered the greatest gains, while slight declines in participation occurred in the major urban States. Similarly, our estimates of Part A participation rates (Table 3-3 on page 37) indicate that up to 96 percent of all eligible children are being served in Group 1, in contrast to an upper-limit estimate of 79 percent for the urban States comprising Group 3.

C. Problems of Access Unrelated to the Statutory Definition

There are at least three categories of Indian children who effectively do not have access to educational services provided by Part A of the Indian Education Act: those not enrolled in public schools, those enrolled in such small numbers as to render local projects impractical, and those in LEAs that elect not to participate in the program. The relative size of these three groups sets significant limits on Part A participation, independent of any possible changes in the statutory definition of eligible children.



Indian children not enrolled in public school

Table 3-3, based on the 1960 sample Census estimates (page 37 above) indicates that as many as 70,000 Indian children may be outside the public school universe. More than a third of these children are in the four States with large proportions on reservations—42 percent more than would be expected if such children were uniformly distributed in proportion to the size of the total school-age population.

Children too dispersed in public schools to be served

The 1976 OCR data indicate that about 13,300 public school Indian enrollments occur in districts where Indian students amount to fewer than 10. As of 1980, according to the Part A Program File, only 7 such children were being served. Looking at the 20,100 Indians enrolled in small school districts (those with total, all races, enrollments of under 300), we saw in Chapter II (page 27) that Part A coverage is fully comparable to that achieved for Indian students in all larger districts. Nevertheless, the administration costs associated with Part A participation impose real limits on the actual levels of service that can be provided in small LEAs or LEAs serving small numbers of Indian children.

Other children in LEAs electing not to participate in Part A

Our OCR-based estimates of public school Indian children not served in 1976—the year for which estimates of this type are most trustworthy—



Our caution in describing this estimate stems from concerns about reporting of Indian enrollments in the Census. For a discussion of this, see pages 38-39 above.

The firthcoming evaluation study of the impact of the Part A services being conducted for the Department by Development Associates, Incorporated may shed some light on thse limitations, even among LEAs qualifying for inclusion in the study—at least 30 Indian students, and at least three continuous years of participation.

show a total of 109,700 (Table 3-1 on page 33). When this figure is reduced by the numbers of Indian children in small LEAs or amounting to fewer than ten in the LEA, we are left with something close to 80,000 in LEAs that might conceivably participate but have elected not to do so. Clearly, this is the most important of the three groups of children who are denied access to Part, A services.

Time has not permitted a full analysis of factors contributing to non-participation of LEAs with significant Indian enrollments. 3 As our analysis in Chapter II demonstrates, there has been a good deal of turnover among the Part A LEAs from year to year (Tables 2-2 and 2-4 on pages '15 and 19). Reasons for this are a matter of speculation, but based on an examination of the size of annual grants to LEAs, we suspect that economic considerations are important. In 1980, 21.6 percent of the Part A grants to local projects amounted to less than \$10,000, and another 46.3 percent were in the range, \$10,000 to under \$40,000. A special program with regular recordkeeping, reporting, and evaluation requirements has certain unavoidable administrative costs associated with it, before anything is spent on the actual provision of service. If staffing and administrative costs are not to exceed 50 percent of the grant amount, we suspect that a total grant of more than \$40,000 may be needed, and as we have just seen, more than two-thirds of the LEA grants were below this figure in 1980. In terms of educational impacts, a lack of sustained service over a period of years, or services amounting annually to only



The special survey conducted by the previous study (described in Appendix A) solicited information on this point directly of a limited sample of non-participating LEAs represented in the Part A Program File, but we are unable to assess the responses obtained since the inquiries were by telephone, and no systematic records were kept.

\$20 or \$30 per child (after deducting administrative "overhead" costs), may be nearly the equivalent of no service at all.

D. The Relation of Definitions to Indian Counts

When answers are observed to vary widely, it is tempting to believe that either the witness is being careless with the truth or the question was not asked with sufficient precision. Lawyers are not alone in believing this. Survey statisticians, when confronted with hard-to-credit numbers, generally complain about careless respondents and set about refining their questions for the next study. Indeed, the analogy can be carried a step further, because experienced lawyers and statisticians have both learned that excessively elaborate questions (generally the price one pays for precision) merely confuse the witness (or respondent) and produce a further loss of quality in the answers obtained.

In regard to Indian statistics, our evidence indicates that in the four major States with high proportions of Indians on reservations it scarcely matters how the question is put—the answers are almost uniformly the same. In other parts of the country, however, the numbers vary dramatically—not only in response to what question is asked, but when the question is asked and the context in which it is presented.⁴

In 1978, in lieu of changing the statutory definition of Indian,
Congress elected to modify and extend the information required on the 506
Indian student certification forms, while mandating this report at the
same time. The 506 forms represent a rather determined effort to
"operationalize," or impart added precision to, the basic question of

⁴ In this latter connection, see our analysis of differences between the complete-count and sample estimates of Indians in the 1980 Census data (Appendix C).

eligibility for services provided under the Indian Education Act.
Unfortunately, there is some reason to believe that, except in the hands
of experienced experts, the 506 form produces confusion: its logic is by
no means self-evident, and lacking familiarity with the statutory
definition, it is not easy to decide how to fill out the form efficiently
and in conformity to the instructions. Our special study of the 506
forms was not designed to pick up evidence of confusion, and it is
reasonable to assume that local project directors have screened out some
of the confusion by asking parents to make corrections. Nevertheless,
there is evidence of confusion in the data we obtained, with about 5 percent
of the forms providing redundent or contradictory responses. 6

We see no solution to the problem of how to impart stability and uniform meaning to the numbers of students locally counted for participation in the Part A program. As members of various Indian communities have pointed out repeatedly, the term Indian has no <u>singular</u> meaning. Indeed, for years, it was the official policy of the Federal government to promote the assimilation of Indian groups and thus dilute or erode the social

It was a failure to conform to this logic that invalidated the special survey conducted by the previous study (see Appendix A). Thus, with some chagrin, we must note that the logically defective question used in that survey escaped the notice of reviewers. We are also unable to find any evidence that this defective question produced any complaints from respondents in the 320 Part A LEAs to whom the questionnaire was mailed.

Many Eskimo and Aleut forms indicate first—and second-degree descent, and for some children shown to be members of tribes in their own right, first—and second-degree descent was also indicated. We are unable to estimate confusion on the point of priorities as between Alaska native, Federal recognition, and State recognition because our method of recording the forms imposed those priorities.

One reflection of the diversity of Indian communities is the fact that coders at the Bureau of the Census recognize more than 500 Indian tribes and 187 Indian languages.

meaning of the term. In the decade of the seventies, however, the Federal government took a number of steps calculated to heighten or validate racial and ethnic self-awareness, and our evidence shows there were substantial shifts in the population toward Indian identification during this period.

Whatever the doubts concerning Indian statistics, the purposes of the Indian Education Act continue to be valid ones, and there is ample evidence of continued need. Responsible managers will always want a system of logical accounts for any program they administer, but there are real costs associated with any accounting system, and those costs should never be permitted to overwhelm the basic purposes of the program.

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Analysis presented in Appendix C indicates that 66,000 of the schoolage Indian children enumerated in the 1980 Census were reported in a different race category in 1970.

APPENDIX A: ANALYSIS OF DEFECTS IN THE ESTIMATES CONTAINED IN THE 1981
REPORT ON THE DEFINITION OF INDIAN

1. The Special Survey of Part A and Non-Part, A School Districts

In May of 1980 the previous study conducted a special mail and telephone survey of a sample of 424 school districts drawn from a "universe" of about 3,200 districts with one or more Indian students. The study relied on this survey for answers to three key questions:

- o How many children would lose eligibility if the statutory definition was changed to exclude second-degree descendants? (Answer: 7,700, or less than 2 percent of all current eligibles.—See Table 9 on page 22 of the 1981 report.)
- o How many eligible Indian children were enrolled in LEAs not receiving Part A grants in 1980? (Answer: Close to 80,000 as indicated in Table 16 on page 31).
- o How many of the Indian children enrolled in LEAs with Part A grants were actually being served? (Answer: 282,430 or about 86 percent of the 328,400 reported enrollments, from Table 14 on page 30).

Defective survey instrument

The survey was initiated through a mail questionnaire which asked just three questions. Question 1 requested identification of the LEA respondent. Question 3 asked for estimated numbers of Indian children being served under Title IV of the Indian Education Act and the percentage of those same children served under the Johnson O'Malley Act. Question 2 is reproduced in its entirety below:



¹ See in this connection Table A-1 on page 61 of the 1981 report.

2.	Please give below the number of Indian children on roll of the schools in your school district as of October 1, 1979, or the nearest date thereto when a membership count was taken.	
	(Number)	
\sim	(a) Of this number:	
	(1) What percentage of these children are members of federally recognized tribes?	%
	(2) What percentage of these children are members of non-federally recognized tribes?	%
•	(3) What percentage of these children do not fall under either of the above categories?	· .
/	TOTAL	100 %
	(b) Of this number, in your judgment:	•
	(1) What percentage of these children are considered Indians only by virtue of their natural parents (ancestors, first degree)?	
	(2) What percentage of these children are considered Indian only by wirtue of their natural grandparents (ancestor, 2nd degree)?	
1	(3) What percentage of these children are considered Indian for <u>neither</u> of the above reasons (for example, adoptions, foster children, children in institutions, etc.)?	

A critical defect is contained in Question 2(b), which refers to the total number of Indian children in the district and requires the percentages to add up to 100. To address the study mandate, the question of

descendency should apply only to the children represented in category three of Question 2(a)—those children that are neither members of federally recognized tribes nor members of non-federally recognized tribes. This concept is expressed in the phrase, "only by virtue of," but is contradicted by the requirement that the percentages add to 100. Based on the few returned questionnaires we have been able to examine, it appears that most respondents ignored the restrictive language of the question and reported percentages which accounted for all of their Indian students. Oddly enough, this interpretation is reflected in the original report's estimates of sampling errors (Appendix A), where the estimated number of second-degree Indian children in the United States is shown to be about 110,000 (plus or minus 5,800), as opposed to the 7,700 figure given in the body of the report (Table 9, page 22).

Incomplete universe of school districts with Indian enrollments

The second major flaw of the special survey is that the universe of school districts from which the survey sample was drawn was inadequately identified. Subsequent investigation revealed that the universe was defined as those districts represented in the Office of Indian Education's Part A Program File. With only minor exceptions, all districts receiving Part A grants over the period 1976 to 1980 are accurately represented in this file, but the file is seriously incomplete in its representation of non-Part A districts with Indian enrollments. Using the Office for Civil Rights 1976 census of public elementary and secondary school districts, we have identified over 3,500 LEAs, with Indian enrollments totaling 34,600, which are not included in the Part A Program file, and therefore could not have been selected for participation in the special survey.



2. Comparisons with Independent Estimates

The prior study included two independent estimates of the number of Indian children for comparison with the estimates on the Office of Indian Education's Part A Program file—the 1978 Office for Civil Rights estimate of Indian children enrolled in public schools, and projections of school—age Indian children from 1970 to 1980. The latter estimates were based on the 1970 census counts, information about births, and certain assumptions about shifts in racial identification contributing to greater numbers of self—reported Indians. These comparisons were designed to address two basic questions:

- The validity question: Are estimates based on the Program file (and the survey which used this file as its sampling frame) reasonably consistent with other independent estimates?
- o The trend question: Have there been significant changes over time in the proportion of independently estimated school-age Indian children claimed by districts participating in the Part A Program?

The validity question was examined from two standpoints. First, estimates of Indian children in public school districts represented in the Program file as of 1980 were compared with the 1978 Office for Civil Rights survey estimates of the same population. Allowing for increases over the two-year interval separating the two estimates, the OCR figure was judged to be about 5 percent lower. However, as the Program file also includes the 1978 claims for Part A districts as well as the 1978 enrollments of other districts not participating in the program, it was not necessary to speculate about changes over the two-year interval. Before making this comparison, however, the 1978 OCR estimate must be adjusted upward to allow for Indian students in districts with total enrollments of less than 300, and by one of those strange coincidences of statistics, this

adjustment amounts to about 5 percent.* Table A-1 incorporates these adjustments in the 1978 OCR estimates, and exhibits logically comparable estimates based on districts represented in the Part A program file for 1978.

TABLE A-1: Comparison of Adjusted 1978 OCR and Part A Program File Estimates for 1978 of Districts with One or More Indian 'Students

Source of Estimate and Size	Number of	Total Indian
of Indian Enrollments	Districts	Enrollments
1978 OCR, Adjusted*		•
1-9 Indian students	4,264	13,700
10+ Indian students	2,830	334,400
TOTAL	7,094	348,100
1978 Part A Program File	<i>.</i> :	
1-9 Indian students	583	2,800
10+ Indian students	2,573	392,300
TÓTAL	3,156**	395,100

^{*} Based on a comparison with the 1976 OCR survey for districts with total enrollments of less than 300, the number of districts shown for 1978 has been increased by 881 (of which 580 fall in the category of 1-9 Indians) and total Indian enrollments have been increased by 18,700 (of which 1,700 fall in the 1-9 Indians gategory).

SOURCE: Special tabulations of the Part A Program File, the 1978 OCR file, and the 1976 OCR file.

^{**} The total number of districts represented in the Program File for the period, 1976-1980, is 3,641, but 485 of these are shown as having no Indian enrollments as of 1978.

^{*} The 1978 OCR survey sampled 6,056 of the estimated 12,000 districts with enrollments of 300 or more. Using data from the 1976 OCR survey (when all 16,000 public school districts were canvassed) it is possible to estimate the number of small districts with one or more Indian students and their total Indian enrollments.

The principal conclusions which emerge from an examination of Table A-1 are first, that the Program File is not adequately representative of the universe of public school districts with Indian enrollments, and second that substantial discrepancies must exist between the numbers of Indian students contained in the Program File for individual districts and what those districts reported to the Office for Civil Rights. Since the Program File contains all of the Part A districts, the net effect of these discrepancies is to substantially understate the number of nonparticipating districts and also to underestimate their Indian enrollments. The only way to obtain conclusive evidence on this last point is to attempt to match individual school districts represented in the two files. Using the 1976 OCR file (the most recent survey covering all public school districts), our analysis shows that about 32,500 Indian enrollments were reported to the Office for Civil Rights in 1976 by districts not represented in the Program File through 1980. A complete description of this analysis is presented in Chapter III.

The second validation comparison was made against the projection for 1980 of 495,600 school-age Indian children as determined from 1970 Census counts and other assumptions. The analysis in Chapter 4 of the previous report demonstrates that after subtracting from this number, children not enrolled in public schools and those enrolled in non-participating districts, the remainder coincides perfectly with the aggregate claims of Part A districts in 1980—namely, 328,400. Unfortunately, there were two critical errors in this analysis: the number of Indian children in public school districts not participating in the Part A programs was underestimated by about 30,000, and the number of school-age Indian children was



overestimated by about 90,000. Thus, when corrections are made for these two errors, it becomes impossible to balance the accounts and validate the claims of Part A districts.

3. Summary of Findings Concerting the Previous Report

Due to inflated projections of school-age children, the omission of a large number of districts with significant Indian enrollments from the Program File on which the previous study relied, and a defective questionnaire, major conclusions set forth in the 1981 report could not be sustained. These conclusions involved the validity of enrollment claims for the Part A program, participation trends in recent years numbers of Indian children in eligible but non-participating school districts, and estimates of the impact of excluding children who are Indian by virtue of second degree descent. Since these matters were judged to be central to the purposes of the study, the Department declined to endorse the report's estimates and undertook the further work which has resulted in this report.

APPENDIX B: DESCRIPTION OF THE SPECIAL STUDY OF THE 506 FORMS (SPRING, 1982)

Overview

This Appendix provides a description of the procedures used by Development Associates' field staff to collect Indian Certification (506) form information from a representative sample of 116 projects during the Title IV, Part A Impact Evaluation. The information was collected during the Spring of 1882 (April, May and June), during site visits which also collected data for the Impact Evaluation. Information was gathered from 33,940 Indian Student Certification forms in the 116 LEAs with Title IV, Part A projects. In some projects, information was copied from all available forms, while in other projects information was copied from a random sample of the forms, based on centrally developed guidelines.

Specific Procedures Used

A number of quality control procedures were used to ensure that (1) the proper number of 506 forms were accurately selected and (2) information was properly recorded without distortion or omissions.

Staff

Experienced, well trained Native American data collectors were used as field staff. The staff were assigned to the same projects which they had visited during the Impact Evaluation study's Fall data collection visit. Only the most qualified field staff were retained for Spring data collection purposes. Thus, these staff were familiar with the local context, and with file data sources at these sites.

Field staff worked in teams of two, with one person designated as team leader. The team leaders were responsible for locating the relevant set of 506 forms from site sources, applying the sampling strategy, and quality control of the recorded information in the field.

2. Training

All field staff were formally trained in group sessions, using a variety of training techniques. The need to perform this work accurately was stressed. Also, all terms were also explained; all questions were resolved; and contingencies were discussed. During training, field staff used and retained a comprehensive field data collection manual which contained explicit instructions, samples of blank forms and examples of how to record information from the 506 forms onto the data collection recording sheets.

3. <u>Selection of Forms</u>

Each member of the field staff was provided during training with a spread sheet indicating the total number of 506 forms expected per site and the sampling fraction to be used in determining the actual number of 506 forms from which data were to be recorded. A supplementary sheet entitled "506 Form Sampling Procedures" was provided the staff for use in determining the particular 506 forms for review. These instructions explained how to select forms using the sampling fraction for each project found on the spread sheet. It indicated, for example, that to apply a sampling fraction of .67, field staff were to collect data from two of every three forms, and that this was to be done by skipping the first form out of every group of three, and using the other two.

Field staff were explicitly told that the sampling fraction was to be applied to the total number of forms <u>actually</u> found at the site, and that the expected number of 506 forms (which came from the project funding application) was provided only as a guide.

4. Recording of Information

Information on descendency and from "item B" of the 506 forms were recorded. Field staff used a machine-processable, specially-designed data recording form with pre-printed labels on columns. This form closely resembled actual 506 forms with respect to the two types of information to be recorded. The project name was written on each data recording sheet used, as well as the page number where there were continuation pages. Each line of the data recording form was used in sequence without skipped lines being present. As many continuation sheets were used as needed to record the full number of students selected.

Staff were instructed first to record information for the item dealing with descendance (i.e., whether the tribal member is a child, natural parent or natural grandparent). Checkmarks were used for recording purposes for this item. If two or more boxes were checked on the actual 506 form, then field staff were instructed to record whatever was marked, and not make any decision on which answer to select. (Central office coders later manually reviewed each page from each site, and based on discussion and guidance from study directors, assigned a unique code to each combination of checkmarks found in this item, so that actual responses were retained.)

Field staff then used checkmarks to record "item B" information. Again, they were instructed to record whatever was found on the actual form, even if both "Column 1" and "Column 2" " were checked. Multiple check marks in either of the two "Columns" also were recorded when they appeared.

Following data collection, quality reviews were done by trained coders and editors at the central office before the data recording forms were sent to the keypunching facility which was given explicit and 100% independent verification data entry instructions. Codes to be keystroked were pre-printed on the form to minimize data entry errors, and were supplemented as needed.

APPENDIX C: EVALUATION OF THE 1980 CENSUS DATA ON INDIANS

1. Increases in Indian Birth-Cohorts Between 1970 and 1980

Table C-1 breaks down the 1970 and 1980 census data for school-age (5 through 17) Indian race children into a set of birth cohorts, specified to facilitate intercensal comparisons, as well as interpolations for 1976. The structure of Table C-1 is familiar to demographers, who are accustomed to "aging" birth cohorts and watching them move up in the population pyramids described by each of the decennial censuses. Thirty or forty years ago, it was even possible to estimate race-and-age-specific mortality

TABLE C-1: Estimates of Indian Children Cohorts from the 1970 and 1980 Census, with Interpolations for 1976

•	160	Numbers in Tho	• • • •	
 	1970	1976 Inter-	1980	1970-1980
Birth Cohorts	Census*	polations	Census**	Increase
1. Born 1953 to 1958	114.7	140.1	157.0	42.3
2. Born 1959 to 1962	91.2	109.8	122.2	31.0
3. Born 1963 to 1965	69.3	87.6	99.8	30.5
4. Born 1966 to 1970	114.3	135.6	149.8	35.5
5. Born 1971		25 🞝	28.2	
6. Born 1972 to 1975		102.0	112.7	
Fotal Ages 5-17 in the years	275.2	358.5	390.5	115.3
Indicated	213.2	220.7	390.3	113.3
Born 1963 to 1970	183.6	223.2	249.6	66.0

^{* 1970} Census estimates are adjusted for Estimated Net Undercounts. See in this connection Passel, Jeffrey S., Provisional Evaluation of the 1970 Census Count of American Indians, in Demography, Volume 13, Number 3, August 1976 ("Preferred Estimate" in Table 1, p. 398).

^{** 1980} Census figures are based on unpublished tabulations of the complete Census returns for Indian, Eskimo, and Aleut children. The estimates shown here have been reduced by 3.8 percent. (The 1980 sample estimate of Eskimo and Aleut children expressed as a percent of the combined races figure for children ages 5-17.)

of the cohort. What is shown in Table C-1, however, is 31 to 43 percent increases in the four birth cohorts for which a 1970 to 1980 comparison is possible. Confronted with data such as these, any traditional demographer would immediately suspect major problems of methodology or serious defects in the logical accounts. In fact, both types of problems are involved in any direct comparison of the published figures for 1970 and 1980, but we have done our best to correct for them in our table. Specifically, the 1970 figures include corrections for an underenumeration of Indians in the 1970 Census, and the 1980 figures have been adjusted to exclude Eskimo and Aleut children for the sake of comparability with the 1970 Census, which included these two groups in the "Other races" category.

Census, we would estimate (allowing for infant mortality) that a little over 250,000 Indian children were born between 1963 and 1970. Using the 1970 Census findings, however, we would believe the true number to be less than 190,000. This particular group is of direct concern because they were living at the time of the 1970 Census, and in 1980, at ages 10-17, were a major portion of the school-age population. Note that the increase in size of this birth cohort accounts for more than half of the ten-year increase in the number of school-age Indian children (66,000 out of 115,300). Are these 66,000 "new Indians," 66,000 previously misclassified Indians, or some impossible-to-specify combination of the two? For further enlightenment, we turn to an examination of the Census questions asked in 1970 and in 1980.

2. Changes in the Form and Meaning of the Race Questions

The most conspicuous difference between the two questions exhibited below is the proliferation of categories between 1970 and 1980—from 9 to 15. Of equal importance is the fact that the 1980 question omits any reference to race. Strictly speaking, there was no race question as such in the 1980 Census.

Item 4 of 1970 Census	Item 4 of 1980 Census
Questionnaire	Questionnaire
4. COLOR OR RACE	4. IS THIS PERSON
Fill one circle If "Indian (American)" also give tribe	Fill one circle.
If "Other," also give race.	o White
	o Black or Negro
o White	o Japanese
o Negro or Black	o Chinese
o Indian (Amer.)	o Filipino
Print Tribe:	o Korean
o Japanese	o Vietnamese
o Chinese	o Indian (Amer.)
o Filipino	Print Tribe:
o Hawaiian	o Asian Indian
o Korean	o Hawaiian
o Other: Print Race:	o Guamanian
	o Samoan
	o Eskimo
	o Aleut
•	o OtherSpecify:

Changes in questions related to race are one expression of the changing meaning of traditional racial categories. Another is the evidence of increases in the size of Indian birth cohorts between 1970 and 1980.

Still another is to be found in comparisons of sample estimates with complete-count figures for school-age Indians in the 1980 Census.



3. Differences Between Sample Estimates and Complete-Count Figures in 1980

Table C-2 shows that the "long-form" Census sample questionnaires appear to have elicited slightly different responses to the (unlabelled) race question than did the "short-form" complete-count questionnaires. Interpretations of the observed differences are partly a matter of speculation, but it is almost certain that the differences are not due to normal sampling variability.

On average, the 1980 Census "long-form" sample covered 20 percent of the population (a minimum sampling rate of 15 percent, and 50 percent; in small jurisdictions with an entitlement under the General Revenue Sharing Act). Normal sampling variability could be expected to produce small deviations above and below the "true" or complete-count figures.

TABLE C-2: Comparison of 1980 Sample and Complete Count Figures for Indian, Eskimo, and Aleut Children, Ages 5-17 (see also Appendix table)

	Numbe	 ,		
•	Complete	20 Percent Sample	Ratio of Col. 2	
	Count Totals	Estimates	to Col. 1	
Alaska	19.6	19.7	1.01	
Arizona	50.1	50.4	1.01	
California	50.3	56. 5	1.12	
Michigan	12.5	• 13.9 •	1.11	
Minnesota	11.4	12.3	1.08	
Montana	11.7	11.9	· 1.02	
New Mexico	33.1	33.6	1.02	
New York	9.8	11.2	1:14	
North Carolina	18.5	18.9	1.02	
Oklahoma	48 <i>•</i> 9	49.2	1.01	
Oregon	7.8	8.6	1.10	
South Dakota	15.3	⁴ 15.9	1.04	
Texas	8.9	11.1	1.25	
Washington	17.6	17.7	1.01	
Wisconsin	9.3	9.6	1.03	
Subtotal	324.8	340.7	1.05	
All Others	81.0	89.1	1.10	
TOTAL, U.S	405.8	429.8	1.06	

SOURCE: U.S. Bureau of the Census, unpublished complete-count tabulations and special tabulations of the sample data for the Department of Education.



Table C-2, however, indicates that the sample estimates are larger for all 15 of the major Part A States (overall, 5 percent higher for the group) and that for the remaining 36 States and the District of Columbia (represented here in the "All Others" category), the aggregate excess.

amounts to 10 percent of the complete-count figure.

4. Estimates of Children of Indian Ancestry But Not Race

Census. Item 14 of the sample questionnaire requested information on each person's ancestry, ("What is this person's ancestry?") and up to two responses were recorded. Thus, it is possible to examine the number of school-age children for whom American Indian ancestry was reported (to the exclusion of any other ancestry) but who were not reported to be of the Indian race (including Eskimo and Aleut). This permits us to consider estimates of "Indian" children, where the definition is expanded to include Indian ancestry (with no other ancestry indicated) but not Indian "race" (the quotes here are to remind us that Item 4 on the 1980 Census questionnaire was not expressly designated as a question about race).

Table C-3 shows that inclusion of only-Indian-ancestry children produces modest increases of 4 or 5 percent in States like Arizona and New Mexico, while more than doubling the Indian race counts for Texas and the other 35 States shown here as "All Others." For three Southern States included in this group, the ratio of Indian-ancestry-not-race children to Indian "race" children ranges from 3.7 to 8.8.



TABLE C-4: Sample Estimates of School-Age Indian Children for 1980, With and Without Only Indian Ancestry Children

	Numbers	in Thousands		•
• -		Other Races But	Total of	Ratio of
States	"Race"=Indian,	Only Indian	Col. 1 and	Co1. 3 to
	Eskimo or Aleut	Ancestry	Col. 2	Col. l
	(1)	(2)	(3)	(4)
Alaska	. 19.7	0.6	20.3	1.03
Arizona	. 50.4	2 . 0	52.4	1.04
California		15.3	71.8	1.27
Michigan		5. 7 }	19.6	1.41
Minnesota		0.7	13.0	1.06
Montana	. 11.9 -	0.6,	12.5	105
New Mexico		1.1	34.7	1.03
New York		5.9	17.1	1.53
North Carolina.		6.4	25.3	1.34
Oklahoma		10.5	59.7	1.21
Oregon		2.9	11.5	1.33
South Dakota		. 0.3	16.2	1.02
Texas		14.9	26.0	2.34
Washington		3.1	20.8	1.18
Wisconsin		0.7	10.3	1.08
Subtotal	. 340.7	70.7	411.4	1.21
All Others		114.4	203.5	2.28
TOTAL, U.S	•	185.1	614.9	1.43

SOURCE: Special tabulation of the 1980 Census sample returns (U.S. Bureau of the Census).

5. Evaluation of These Observations

The behavior of the 1980 Census statistics on Indian race and ancestry, and the differences in those statistics observed here among States, are generally consistent with what might be called the social-psychological theory of race. Under this theory, the facts (and statistics) of race will be most stable—both socially and psychologically—where there are established patterns of discrimination based on race, and where members of a given racial group are readily identifiable within their communities. The 1980 Census "race" question is an amalgam of discriminations being made (or urged) across a diverse range of "communities" but there is no



community in which all the choices it offers are meaningful. Standard responses to progressively elaborated questions are simply not to be expected; as the race question changes, so will the answers.

In regard to the State differences we have observed, the theory fits quite well: In States where higher proportions reported a specific tribal affiliation (of those checking American Indian on the "race" question) the statistics are more stable. The same holds for States with larger proportions of Indians, and for States where there are significant numbers living on reservations. Using the 50 States and the District of Columbia as our units of analysis, three variables--percent total population Indian, percent of all Indians (race) reporting a tribe or living on a reservation, and percent in homes where an Indian language is spoken--are significantly correlated with both of the variables which measure the "expandibility" of Indian counts. This evidence is presented in Table C-4.

Correlations Between State Level Attributes of the Indian Population and Two Measures of the Expandibility or Instability of Indian Counts.

Ratio of Sample	Ratio of
to Complete-Count	Ancestry Only
Oli Race	LO Nace
P	
r =31*	r =29*
5 -	•
•	***
r =42**	r =72***
***	•
	x.
	r =38**
	0.
	7)
	on Race r =31*

Census Sample and Complete-Count

data.

Pr. less than .01

*** Pr. less than .001

On the basis of this evidence, we conclude that the 1980 Census data on Indians have a dual significance: they continue to tell us a great deal about the real situation of Indians in different parts of the nation, but at the same time they also tell us something about the changing meaning of "Indian" as a response to different questions presented in different contexts and in different times.

APPENDIX D: DETAILED STATE TABLES

- 1. Part A Participation in 1976 and 1980
- 2. Changes in Part A Participation, 1976 to 1980
- 3. Matched Comparisons with the 1976 OCR File for Part A LEAs
- 4. Variables Used in Defining Five State Groups
- 5. Racial, Tribal, and Language Characteristics of School-Age Children
- 6. Educational Characteristics of the School-Age Indian Population
- 7. Measures of Concentration of Indian Children in Public Schools: 1976
- 8. Selected Characteristics of Individual States
- 9. OCR Reports of Indians in Public School, 1976, 1978, and 1980
- 10. Comparison of 1980 Census Sample, Complete-Count, Race, and Ancestry Data





TABLE D-1: PART A/PARTICIPATION IN 1976 AND 1980

+TOTAL	GRANTS+	+NUMBER	0F	LEAS+	+TOTAL	INDIANS+
	• • • • • • • • • • • • • • • • • • • •		٠.	F FUO		THE TONG .

STATE	1976 [1]	1980 [2]	1976 [3]	1980 [4]	1976 [5]	1980 [6]
ALABAMA ALASKA ARIZONA ARKANSAS	99,485 3,244,715 2,241,049 14,223	225,794 5,289,598 4,267,972 29,615	5 46 40 1	6 44 60	1,313 17,195 24,200 206	2,133 17,992 33,200 329
CALIFORNIA COLORADO CONNECTICUT DELAWARE	3,918,401 142,222 31,090 0	5,535,601 199,825 23,962 0	159 11 5 0	155 ° 8 2 0	36,258 1,361 241 0	37,243 1,806 151
D C FLORIDA GEORGIA HAWAII	73,967 3,967	0 60,991 0 .0	0 5 1 0	0 5 0 0	0 764 50 0	5 10 0 0 0
IDAHO ILLINOIS INDIANA IOWA KANSAS	165,094 143,977 6,447 94,075 140,049	219,893 96,045 8,294 97,406 167,708	12 · 2 2 5 7	11 . 2 . 2 . 3	2,077 1,164 68 897	2,026 629 7
KENTUCKY LOUISIANA - MAINE & MARYLAND	376,898 56,899 263,716	0	· 0 8 10 7	0 6 4	1,355 0 660 2,056	1,250° 0 3,090 462 1,518
MASSACHUSETTS MICHIGAN MINNESOTA MISSISSIPPI	62,810 2,467,647 1,484,815 3,906	132,387 2,909,409 1,669,008 0	7 121 61 2	4 107 56 0	557 19,389 11,894 60	714 18,008 10,643 0
MISSOURI MONTAHA NEBRASKA NEVADA NEW HAMPSHIRE	5,434 896,681 187,908 260,030	5,167 1,655,014 222,711 398,706	1 38 12 11 0	1 48 10 11	57 8,296 .1,836 2,559	42 10,583 1,586 3,034
NEW JERSEY DIXAM WAN NORK NORK WAN NORK	2,090,317 1,089,503 1,082,041	0, 36,646 3,106,057 1,111,935 1,731,891	0 20 16 20	1 23 15 23	0 0 23,460 5,693 12,697	0 186 25,172 4,954 16,140
NORTH DAKOTA OHIO OKLAHOMA OREGON	327,896 69,419 5,348,291 474,921	616,943 183,276 9,248,767 921,319	14 4 219 22	22 4 277 30	3,599 705 65,621 3,919	4,905 1,437. 79,501 5,509
PENNSYLVANIA RHODE ISLAND SOUTH CAROLINA SOUTH DAKOTA	0 0 0 772,238	19,676 6,995 1,205,966	0 0 0 30	0 3 1 34	0 0 0 8,915	0 122 70 10,595
TENNESSEE TEXAS UTAH VERMONT VIRGINIA	95,784 95,784 300,969 0 27,923	0 149,344 520,006 25,445 22,923	0 8 15 0 3	0 5 15 1 2	0 ° 1,158 3,632 0 287	0 1,214 4,954 193 194
WASHINGTON WEST VIRGINIA WISCONSIN WYOMING	2,093,326 11,290 816,455 124,777	2,819,209 0 1,052,555 266,300	69 1 35 6	74 •0 38 8	18,283 140 7,016 1,093	17,897 0 6,556 1,635
U. S. TOTAL	31,110,353		1,061	A 1,134	956 - م9 56	328,407

NOTE: Column 6 contains about 6,400 enrollments in 32 tribally-controlled schools. These schools received grants amounting to about \$4.7 million in 1980, in addition to the total shown at the bottom of Column 2 for LEA grants in 1980.

TABLE D-2: CHANGES IN PART A PARTICIPATION, 1976 TO 1980

+-NUMBER OF LEAS PARTICIPATING-+ +---CHANGES AN INDIAN COUNTS---+

STATE	, 176 2 180 [1]	ONLY '76 [2]	ONLY '80 [3]	NET DIFF ALL LEAS [4]	LOSSES (176 ONLY) [5]	GAINS ('80 ONLY) [6]
ALABAMA ALASKA ARIZONA ARKANSAS CALIFORNIA COLGRADO CCHMECTICUT FLORIDA GEORGIA IDAHO ILLINOIS INDIANA IOWA KANSAS LOUISIANA MAINE MARYLAND MASSACHUSETTS MICHIGAN MINESOTA MINESOTA MINSSISSIPPI MISSOURI MONTANA NEBRASKA NEW ADA NEW YORK NORTH CAROLINA NORTH CAROLINA NORTH CAROLINA NORTH CAROLINA OREGON RHODE ISLAND SOUTH DAKOTA OHIO OKLAHOMA OREGON RHODE ISLAND SOUTH CAROLINA SOUTH DAKOTA TEXAS UTAH VERMONT VIRGINIA WASHINGTON WEST VIRGINIA WISCONSIN WYOMING U. S. TOTAL	41 38 12 12 12 13 14 18 18 19 10 10 10 10 10 10 10 10 10 10	1520943114002126149902144103111033300740018130 3	2320510103000000155014211604901131110103062 25014211604901131110103062 276	7817732711004204815835416086594626320792394372 7,91212711004204815835416086594626320792394372 7,012176490396920792394372 7,012176490396920792394372 7,012176490396320792394372 7,012176490396320792394372 7,012176490396320792394372 7,012176490396320792394372	110 1,645 029 1,645 03,459 140 089 1,089 1	448 279 7,775 5,548 7,775 5,548 130 000 125 12430 2,432 1,446 186 186 1,933 1,468 1,933 1,468 1,933 1,468 1,933 1,468 1,521 1,
- · - · · · · · · · · · · · · · · · · ·			-·-	-		2

NOTE: Gains shown in Column 6 include enrollments in tribally-controlled schools (amounting to about 6,400) not included in the 1976 student counts.

TABLE D-3: MATCHED COMPARISON WITH 1976 OCR OF 1976 PART A LEAS

+---- NUMBER OF MATCHED LEAS---+ +-EXCESS OF PART A INDIANS OVER OCR+

State	TOTAL NUMBER [1]	# OVER 110% OF OCR [2]	RATIO OF 2 TO 1 [3]	NET EXCESS [4]	EXCESS AS % OF OCR [5]	EXCESS IN LEAS >110% OF OCR [6]
ALABAMA ALASKA ARIZONA ARKANSAS CALIFORNIA COLORADO CONNECTICUT FLORIDA GEORGIA IDAHO ILLINOIS INDIANA IOUA KANSAS LOUISIANA MAINE MARYLAND MASSACHUSETTS MICHESOTA MISSISSIPPI MISSISSIPP	52401 1541 1541 1551 1222578577779213111216022444198535156.22 1,022 1,022 1,022 1,022	4 6 7 0 1 5 2 3 1 5 2 3 1 5 2 3 7 0 1 2 2 3 3 1 3 1 3 1 3 1 3 1 3 1 3 1 3 1	0.800 0.1435 0.001 0.465 0.465 0.4600 0.600 0.600 0.500 0.540 0.577 0.6287 0.62	755 -914 1,828 6,264 -109 31 169 35 169 571 270 270 1,508 1,102 -963 1,102 -983 16,760 1,700 -183 16,760 1,700 -183 16,760 1,760 -183 -192 -193 -193 -193 -193 -193 -193 -193 -193	135.42204.8297185068118040854709668324190178 2774.823103.44159.150.854709668324190178 150.854118040854709668324190178 14.770.47709668324190178	382 119 934 10,400 91 174 14 226 19 62 95 590 443 1,405 1,405 1,206 1,207 1,635 1,207 1,635 1,
G. G. IGIAL	.,	,				

NOTE: Negative figures in Columns 4 and 5 indicate that Part A student counts were lower than Indian enrollments reports to the Office for Civil Rights.



TABLE D-4: VARIABLES USED IN DEFINING FIVE STATE GROUPS

	•	+IND	TANS AGE 5-17		+	summary I	HDICATORS	+
· Y	STATE	TOTAL NUMBER [1]	PCT ON RESERV. [2]	PCT URBAN [3]	COL.1 >3500? [4]	COL.2 >58? [5]	COL.3 >60? [6]	PART A IN '80? [7]
	ALABAMA ALASKA ARIZONA ARKANSAS CALIFORNIA	2,201 19,745° 50,377 2,907 56,520	0 1 76 0	37 29 20 37 81	YES YES YES	YES	 YES	YES YES YES YES YES
	COLORADO CONNECTICUT DELAMARE D C	5,478 1,168 314 137	11 1 0	73 81 27 100			YES YES (YES YES	YES YES YES
	FLORIDA GEURGIA HAMAII IDAHO ILLIKOIS	4,763 2,214 505 3,322 4,484	4 0 0 4 1	71 51 81 30 83			YES YES	 YES YES
E	IONA KANSAS KENTUCKY	2,147 1,933 4,173 887 3,355	0 6. 5	72 69 67 57 45	 , ,		YES YES YES	YES YES YES YES
	LOUISIANA MAINE MARYLAND MASSACHUSETTS MICHIGAN	1,226 2,198 2,585 13,865	0 . 4	29 84 82 62	 YES		YES YES YES	YES YES YES YES
	MINNESOTA MISSISSIPPI MISSOURI MONTANA NEBRASKA	12,302 2,090 3,067 11,945 2,943	26 48 0 62 31	57 19 54 23 50	YES YES	YES		YES YES YES YES
	HEVADA NEW HAMPSHIRE HEW JERSEY HEW NEXICO	3,636 256 2,302 33,604	32 0 0 58	53 34 84 16	 YES	 YES	 , YES 	YES YES YES
	NEW YORK NORTH CAROLINA NORTH DAKOTA OHIO OKLAHOMA	11,155 18,863 6,727 3,376 49,242	1.7. 6 1 5 5 9 6 1 6 1 6 1 6 1 6 1 6 1 6 1 6 1 6 1 6	63 20 18 76	YES YES YES	* YES	YES:	YES YES YES YES
	OREGON PENNSYLVANIA RHODE ISLAND SOUTH CAROLINA	8,638 2,537 876	13 0 0 16 63	52 70 86 33	YES YES	 YES	YES YES	YES YES YES YES
	TEXAS, UTAH VETMONT	1,346 11,130 7,159 273	0 1 34	60 78 53 14	YES		YES	YES YES YES YES
	VIRGINIA HASHINGTON / HEST VIRGINIA HISCONSIN WYONING	2,017 17,741 43/9 9,686 2,48	1 29 0 31	70 50 28 45 25	YES		YES 	YES YES YES
	U. S. TOTAL .	429,817	26	46 _			•	

NOTE: Calculation of percent urban (Column 3) excludes Indians in urban places located on reservations. With respect to the summary indicators, the four States comprising Group 1 in our text tables are those with a "yes" in Columns 4 and 5, while Group 3 States, are defined by yeses in Columns 4 and 6.

D-4

TABLE D-5: RACIAL, TRIBAL, AND LANGUAGE CHARACTERISTICS OF SCHOOL-AGE CHILDREN: 1980

★--TOTAL-+ +AMERICAN INDIANS EXCLUDING ESKIMO AND ALEUT+

STATE	NUMBER	NUMBER [2]	PROP REP TRIBAL AFFIL.	PROP REP RESID.ON RESERV. [4]	PROP REP USE OF IND LANGUAGE' [5]
LOUISIANA MAINE MARYLAND MASSACHUSETTS MICHIGAN MINNESOTA MISSISSIPPI MISSOURI MONTANA	176145 176145 176145 176146 17	2,73 173 2,73 173 173 173 173 173 173 173 173 173 1	0.6710 0.98372280 0.98372280 0.78782580 0.78782580 0.788583114362810 0.78855110 0.6788583114362810 0.7885512289752247 0.7885565128897522487 0.88854857190 0.888548590 0.8	0.03940 0.03940 0.0760	0.7772 0.7793 0.0246 0.07972 0.00243 0.00413 0

* Proportions shown in Columns 3 and 5 are for children enrolled in public school only. The number of children in homes where an Indian language is spoken (used in calculating the Column 5 proportions) includes Eskimos and Aleuts, but this produces an appreciable distortion only in the case of Alaska, where an impossible value of 1.7 is shown. The correct proportion, excluding Eskimo and Aleut children, is .277, or 1,691 out of the 6,106 Indian children enrolled in public schools in Alaska.

D-5

TABLE D-6: EDUCATIONAL CHARACTERISTICS OF THE SCHOOL-AGE INDIAN POPULATION +-----NUMBER ENROLLED IN K-12----+++----NOT ENROLLED---+.

STATE	TOTAL [1]	PUBLIC [2]	PRIVATE ON RES. [3]	PRIVATE OTHER [4]	ТОТАК [\$/]	PROP OF ALL 5-17 [6]
ALABAMA ALASKA ARIZONA ARKANSAS CALIFORNIA COLORADO CONNECTICUT DELAWARE D C FLORIDA GEORGIA HAWARI IDAHO ILLINOIS INDIANA IOWA KANSAS KENTUCKY LOUISIANA MAINE MARYLAND MASSACHUSETTS MICHIGAN- MINNESOTA MINNESOTA MINNESOTA MINNESOTA MISSISSIPI MISSISSIP	2,031 184,603 44,603 44,603 41,158 52,684 1,297 41,963 41,963 41,963 41,963 41,963 41,963 41,963 41,963 41,963 41,963 41,963 41,963 41,963 41,963 41,040 41,963 41,040 41,	1,850 17,183 17,183 2,452 1,913 49,521 1,017 1,0	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	181 351 505 119 3,065 112 278 471 273 164 187 164 187 164 187 164 187 188 188 188 188 188 188 188 188 188	1704995728709967506 1,6319572870595228499996333849999633232529542 42,13388499996332325295976477570077647709967506 1,7338873773792597647709967506 1,733887377926477990077647709967506 1,7338874977570077647709967506 1,7338874977570077647709967506 2,4464709967506 42,4464709967506 42,4464709967506 42,4464709967506	0.077 0.083 0.12/5 0.10/5

NOTE: Numbers of Indian children enrolled in private schools (the difference between Columns 1 and 2 or the sum of Columns 3 and 4) may be overstated in the 1980 Census reports. This is discussed in Chapter III, pages 38-39.

TABLE D-7: MEASURES OF CONCENTRATIONS OF INDIANS IN PUBLIC SCHOOLS, 1976

+PROPORTION IN SCHOOLS WHERE INDIANS ARE:+

STATE	FCT. ALL STUDENTS INDIAN . [1]	TOTAL INDIAN STUDENTS [2]	LESS THAN 5 PERCENT [3]	5 TO UNDER 20 PERCENT [4]	20 PERCENT OR MORE [5]
ALABAMA ALASKA ARIZONA ARKANSAS CALIFORDICUT DECOLORECTICUT DECOLORECTICUT DECORRETA GEORGIA HAWAII IDAHOOIS INDIA KANSAS KENTUCKANA MAINE AND SETTS MICHISTONA MISSISSIPPI MISSOURI MONTANA MASSISSIPPI MISSOURI MONTANA MISSISSIPPI MISSOURI MONTANA NEW JERSEY NEW YORK NORTH DAKOTA NEW YORK NORTH DAKOTA NEW YORK NORTH DAKOTA OHIO OKLAHOMA OREGON PEHODE ISLAND SOUTH CAROLINA NORTH DAKOTA OHIO OKLAHOMA OREGON PEHOSE TEXAS UTAH VERMONT VIRGINIA WISCONSIN WIS	0.1533061100.114621365532193125821153491153125415110 8 0.0000000000000000000000000000000000	1,293 18,293 30,5293 31,296 31,296 31,296 31,296 31,295 31,389	0.436 0.012 0.415 0.717 0.7400 1.0000 1.	0.564 0.277 0.106 0.241 0.051 0.000 0.0051 0.00	0.71855 0.012555420 0.0587420 0.00000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.00000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.00000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.00000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.00000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.00000 0.00000 0.000000
	•				

NOTE: For a discussion of these data, see pages 23-24 and 32.

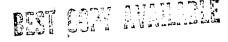


TABLE D-8: SELECTED CHARACTERISTICS FOR INDIVIDUAL STATES

+BIA-OPERATED SCHOOLS+

+--506 FORMS SAMPLE-+

STATE	1970 INDIAN POVERTY RATE ALL AGES% [1]	NUMBER [2]	TOTAL ENROLLMTS [3]	# OF PART A TRIBAL SCHLS IN 1981 [4]	LEAS IN UNIVERSE *[5]	LEAS IN SAMPLE [6]
ALABAMA			-	0	6	1
ALASKA	32	45	3,393	1	34	6
ARIZONA	60	42	13,217	2	50	10
ARKANSAS	<u> </u>	, 		Ō	1	0
CALIFORNIA	21	. 1	588	0	108	13
COLORADO				0	6	Q ;
CONNECTICUT	_	_	· -	0 .	1.	1
DELAWARE	_	_	· -	Q	Ō	0 ·
D C	· -	_		Ġ.	0.	. 0
FLORIDA	-	1	77	1	2	1
GEORGIA			-	0	0 .	U
HAUAII			-	, U	0 s	U
IDAHO	_		_	2	0	
ILLINOIS	-	_	· · · <u>-</u>		1	'n
INDIANA '		<u>-</u>	_	0	2	ň 🗸
IONA	-	_	_	Ů	5	1
KANSAS	_	_	_	n .	. 0	Ó
KENTUCKY LOUISIANA	ar <u> </u>	_	_	Õ	γ , $\frac{3}{2}$	- 1
MAINE		_ · ·	J	Õ	1	. 1
MARYLAND	_	· -	_	Ŏ	5	1
MASSACHUSETTS		_	· -	0	2	0
MICHIGAN	23	-	_	ъ 1	74	8
MINNESOTA	38	-		2	₄ 45	4
MISSISSIPPI	- -	7	1,319	0	0 ,	0
MISSOURI	, -	-	-	. 0	1	0
MONTANA	45	-	· · -	4 .	29	5
NEBRASKA	-	-	-	0	8	1
NEVADA	-	1	507	2	10	1
NEW HAMPSHIRE		-	-	Û	• 0	₩ 1
NEW JERSEY	-	7.0	0 470	υ 5	17	4
NEW MEXICO	54	.38	8,438) n:	13	2
NEW YORK	¹ 22 44	-	1,335	n	20 🔪	. 3
HORTH CAROLINA	44	7	3,387	•	18	2
NORTH DAKOTA OHIO	• _	<u>′</u>	3,367	Ò	4	Ō
OKLAHOMA	· 38	6	1,266	. 0	217	2 5
OREGON	26	ĭ	273	0	. 23	3 ·
PENNSYLVANIA	-	_	-	0	0	Õ
RHODE ISLAND			-	0 .	1	0
SOUTH CAROLINA	_	-	-	0	0	Ō
SOUTH DAKOTA	56	19	4,339	3	24	4
TENNESSEE			-	0	0	U
TEXAS	23	-	-	0	3	1
UTAH	-	3	1,218	0	12 1	2 0
VERMONT	-	-	-		2	0
VIRGINIA		-	<u>-</u>	U 2	63	7
MASHINGTON	29	<u>-</u>	-	<u>ر</u>	0	ά
NEST VIRGINIA	7.2	<u>-</u>	_	34	30	, š
HISCONSIN WYOMING	32	- -	• _	0 2 0 39 2	6	· i
MIDITING	_		`	-	_	
			· · · · · · · · · · · · · · · · · · ·	~ 4	٥٠٠	1 14
U. S. TOTAL	38	172	39,357*	3 1	859	1 16

SOURCES:

Col. 1: American Indians, Vol. 2, No. 1F, 1970 Census of Population. Cols. 2 and 3: Statistics Concerning Indian Education, FY 1979. U.S. Department of Interior, Bureau of Indian Affairs, Office of Indian Education Programs.

Col. 5 shows the number of LEAs with Part A funding in 1979-1981 and at least 31 Indians counted for participation.

TABLE D-9: QCR REPORTS OF INDIAN ENROLLMENTS, 1976 TO 1980 #--1976 ENROLLMENTS-+ +---1978 ADJUSTED---+ +---1980 ADJUSTED---+

			•		_	
STATE	TOTAL ALL LEAS [1]	IN LEAS <300 [2]	TOTAL [3]	% CHANGE FROM 1976 [4]		% CHANGE FROM 1978 [6]
ALABAMA ALASKA ARIZONA ARKANSAS CALIFORNIA COLORADO CONNECTICUT DELAWARE				1 - 2860145328317191709325355611473889607050504320686 	TOTAL	FR [0M 6] -3.3955.41551.63491011989274504777788626117777054075142 -4.155.163491011989274504777788626117777054075142 -4.155.163491011989274504777788626117777054075142
U. S. TOTAL	368,262	21,799	348,438	-5.4	326,551	-6.3

NOTE: Since the 1978 and 1980 OCR surveys did not cover LEAs with total enrollments under 300, the figures for these years have been adjusted to include Indian students reported in 1976 in small LEAs (Column 2).



TABLE D-10: COMPARISONS OF 1980 SAMPLE, COMPLETE-COUNT, RACE, AND ANCESTRY DATA +-TOTAL INDIANS 5-17+ +INDIAN ANCESTRY NOT RACE+

STATE	COMPLETE COUNT [1]	RATIO OF SAMPLE TO C-C	INDIAN RACE (SAMPLE) [3]	TOTAL [4]	RATIO TO RACE TOTAL
ALABAMA ALASKA ARIZONA ARKANSAS CALIFORNIA COLORADO CONNECTICUT DELAWARE D C FLORIDA GEORGIA HAWAII IDAHO ILLINOIS INDIANA IOWA KANSAS KENTUCKY LOUISIANA MARYLAND MASSACHUSETTS MICHIGAN MINNESOTA MINNESOTA MINNESOTA MINNESOTA MISSISSIPPI MISSOURI MONTANA NEBRADA NEWA HAMPSHIRE NEW YOLK NORTH CAROLINA NORTH CAROLINA NORTH DAKOTA OHIO OKLAHOMA OREGON PENNSYLVANIA RHODE ISLAND SOUTH CAROLINA SOUT	2,08 19,024 19,123 190,233 190	1.006 1.005 1.300 1.123 1.158 1.112 0.189 0.976 1.310 0.976 1.125 1.148 1.170 1.089 1.213 0.976 1.346 1.346	2119077770884773775657777088477377708847737770988477377709884773777097884773777097884773777097889777709788977779789789787779789789787779789789	6797 2,7664 5,6685 6,5990 2,5990 3,1928 3,1928 1,19	0.040 2.271 0.316 0.677 0.316 0.914 2.099 1.389 0.287 0.287 0.287 0.287 0.299 0.053 0.053 0.033 0.049 0.053
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NOTE: "Indian ancestry children" had no second (non-Indian) ancestry reported, but were not reported to be American Indian, Eskimo, or Aleut on the Census race question.

"END OF DOCUMENT"

D-10

DEST COME FUNCTIONS